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Office of Enforcement
Compliance & Environmental Justice

Wastewater Treatment Plant [307] 352-1465
Building Inspections [307] 352-1541
Planning and Zoning [307] 352-1540
Vehicle Maintenance [307] 352-1452

Department of Public Services

212 D Street, Rock Springs, WY 82901
Office [307] 352-1540 • FAX [307] 352-1545

EPA Pretreatment Audit Response

DECEMBER 14, 2010

1. & 2.

Will be submitted by the **June 30 2011** date, with ERP modification also.

3.

To improve our data evaluation procedures we are using the attached forms for each permitted IU and SIU reporting period, monthly, quarterly and semi-annual. We are also changing all reporting periods to quarterly or less to ensure closer monitoring of the IU/SIU by themselves and us. The forms include the running violation list in each file, sample copy attached, which is updated as a violation occurs. When a Self Monitoring Report is submitted, a file review is done and dated, at least once each month for all IU/SIU. Changes to our Self Monitoring Report check list to include a date when the last SNC calculation was done. Changes to the tracking board to include last SNC calculation date and next due date for each IU/SIU. We have also started using file review log sheets which have been placed on my desk to keep this in view and at the top of our list. This will all be all be completed and completed and implemented by **January 28, 2011**.

(Section 6.0)

4.

The City IU inventory with characterization, categorization and status is being upgraded, and will be available by **January 6, 2010**, it will also be made available on the City Web Site under a new Pretreatment Program Information site.

(Section 7.0)

5.

The City reviewed all IU/SIU files and tested all trunk lines in the City for Sulfates, an indicator of H₂S. We have found no IU/SIU source or any other business which is discharging H₂S to the City Sewer System.

What we have found is several sites where springs are infiltrating into the sewer system via manholes, old pipes, and possibly old building basement sump pumps. There is an indication that some amounts are coming from slow flowing or flat lines and line cleaning, but the majority with the highest content is coming from the many springs in the City. These springs are high in Sulfates, which indicates H₂S is present or can be present. I have attached a spreadsheet showing testing program results. A plan is being formulated to resolve these issues as quickly as possible. Again there are no sources coming from businesses or industries in the City. Once funding has come available we will proceed to remove as many of these inflow and infiltration sites as possible. Work should begin next spring, around April-May 2011.

(Section 7.0)

6.

a. We are changing all our permits and our Permit template to the same SNC criteria statement as in our Ordinance Article 7-403, Section 27-02(f)

b. We have changed all our permits and our Permit template to require that the Permitted IU sign and date the Self Monitoring Report as part of the Permit Reporting Conditions. This will also be reviewed in our Ordinance and changed as needed to insure they are the same.

c. We have changed all our Permits templates to require the signed Certification Statement, and all our IU templates for Self Monitoring Report Forms to the same certification statement as found in CFR 403.6(a)(2)(ii) of the General Pretreatment regulations. This was done on November 10, 2010.
(Section 8.0)

7.

The City has attached a letter allowing the Pretreatment Coordinator/Special Projects and Programs Coordinator to sign the Permits as well as all our other pretreatment program aspects, except the annual report. Dated October 20, 2010

(Section 8.0)

8.

a. The City is removing the received Date and Time lines on the top left of all our documents, we will be using a date stamp on all our documents as they are received. This will be completed by January 28, 2011

b. The City has taken enforcement actions against Tri-Mac and has required a cease discharge until Tri-Mac can demonstrate continued compliance with our local limits. All items noted were listed in the action taken. A copy of that action is attached, with a copy of the public notice in the local newspaper.

We are also working to ensure that the ERP is more defined and followed from now on by closer file and report reviews to include monthly SNC evaluations and a running violation list in the IU file which will allow easier determination for escalation of enforcement actions as required in the ERP. A new Phone contact log is also being used. A copy is attached. The ERP changes will be Completed by June 30, 2011

(Section 8.0)

9.

First the City has drafted a memo to all permitted IU's and SIU's that informs them of the reporting requirements for violations and the time limit to do so, as well as the procedures and contact information. These will all be sent with return receipts by January 6, 2011.

a. The City has taken action with a Letter of Notification to notify Weatherford of the copper Violation and the failure to notify the City within 24 hours and written notice within 5 days of all violations. A copy of that action is attached. Weatherford was also notified that a recent Cadmium (Cd) test was performed by their testing lab SPL, and the lab used the local limit as the detection limit which is a violation. This is also included in the Letter of Notification to Weatherford.

b. The use of a plastic bottle for TPH was addressed with a documented Phone Call to Weatherford regarding not following 40 CFR Part 136 methods, and that this is considered a violation. Weatherford was told that they are required to use proper containers and preservatives for their sampling as required in 40 CFR Part 136. Weatherford was informed that they must document sampling events with a date, time, location and type of sample, that this must include a sample identification number, and that failure to do this would be considered a reporting violation.

c. Samples taken on July 15 by the City had multiple different containers for different parameters, all were unfiltered some of which were preserved as required by 40CFR Part 136. All our sample container tags have a City identification number (used on COC), City name, date, time, who collected the sample, sampling site, check box for grab or composite, test required and preservative used. The treatment codes used are to assist the lab in identifying the sample condition and method of preparation, and preserving each sample group. As the City collects many samples in one sampling event for many IU's, we were using a multiple application and use COC with codes to address some requirements due to space on the form.

The City is Currently trying to build new City COC which can be used for a single IU, which will show that each sample container for each parameter tested is listed with each preservative type or not preserved, and tests requested of this sample container, this will require a line for each container and each parameter. Due to the number of containers that can be used for the parameters that can be tested this will take some time to design. Please provide an example COC of how this is done by EPA. We are also developing a Sampling procedure and tracking log for each IU sampled and each event. We will continue to use our current Sample identification numbers, because as always listing the company name consistently may allow for poor lab results. This will be completed by February 12, 2011.

d. The Antifreeze and Parts washer noted at the time of the inspection were not located at those sites during our last visit. The City is very vigilant about chemicals stored next to drains of any kind, and would have addressed this immediately. Within two days of your site inspection the Antifreeze and Parts washers were removed from the area of the drains and containment was being addressed, and has since been completed.

e. The leaking hose was also new since our last visit, the poor condition of the area has been a work in progress, and lack of O&M and lack of O&M knowledge by the Staff were addressed in the Letter of Notification to Weatherford which is attached. A follow up discussion with the new facility manager, Shop Foreman and Environmental Contact regarding the O&M of the system and City expectations has since been completed.

Please note that although Weatherford items d. and e. above were conditions noted during your inspection at Weatherford, the City does do inspections and does address issues of this nature. These are in no way indicative of how well our IU's are inspected. Please also note that very few violations have occurred at this facility in the past. But as with all industries personnel change, and problems do arise from these changes, as you noticed by the new management at Weatherford and their knowledge of the system O&M.
(Sections 6.0, 8.0, 9.0, 10.0)

10.

a. Halliburton Energy Services is on a Quarterly monitoring requirement in their Permit, this is the frequency which they are required to monitor their discharge. It is suggested that they take samples during the first part of this quarterly period. The third quarter of 2009 would be July, August, September. The report due date would be October 10th, as stated in their Permit. I can find no violation of reporting requirements by Halliburton Energy Services, therefore no enforcement action has been taken. I have attached a copy of their Permit and the quarterly Self Monitoring Report for that period for your review, if I have missed something, please let me know.
(Section 8.0)

11.

a. The City has issued a Notice of Violation for reporting violations to Terracon RS-3 for failing to provide the required Lab Certification on October 9, 2009, and January 9, 2010. A copy of this action is attached.

b. The Terracon RS-3 LEL 5% Limit was derived from our ability to implement and use controls to protect worker health and safety. The LEL 5% is used to control a valve which will shut off if the discharge from this groundwater cleanup site if the LEL hits 5%. This is just a safety device should the treatment process fail, and was done to prevent the discharge of volatiles into the sewer system which would create a worker health and safety issue. We are moving this from the local limits list and putting it into requirements section of the permit. Again this is not a permit local limit, just a clerical placement error which we have resolved. It is a safety device such as a flashing red light would be. It is possible that this could be adopted as a BMP, when the Ordinance revision is approved.
(Section 8.0)

12.

a. The City has completed our fact sheet /rationale upgrade for the Memorial Hospital of Sweetwater County, and found that a clerical error was made regarding the facility designation, it is designated as an SIU as stated in the Annual Report. A copy of all IU/SIU fact sheets /rationale, will be completed and a copy forwarded to you by January 28, 2011

b. The Slug control plan was submitted as required, (an updated copy has been requested), but was removed from the file to copy for a template, which was to be used to show another permitted user what was needed. It apparently has been given to another IU. It will be located and put back into the file, and copy will be provided as quickly as possible. This should be completed by January 28, 2011

c. The City is developing the sampling protocol and method books for each permitted IU/SIU. A review of the Memorial Hospital of Sweetwater County permit has shown some corrective actions are needed in both the permit and the sampling procedures. This will be addressed as part of the site specific sampling books we are developing. A photo copy of these procedures will be sent when completed. We are also working on our Chain of Custody forms to resolve the confusion and to streamline the format and use of the forms for each sample and each sample bottle test parameter. This was discussed in item 9. (c) above. These will be completed by February 12, 2011.

d. Enforcement action has been taken against the Memorial Hospital of Sweetwater County items (i)(ii)(iii)(iv), and a copy of that action is attached, including the public notice in the local newspaper.
(Sections 8.0 and 10.0)

13.

The City has added a Signature Line on the IU/SIU Inspection form to comply with this requirement. This item is completed. (Section 9.0)

14.

The City instituted the use of a wall mounted tracking board in 2009, right after 2008 to monitor and to insure that a sampling event is not missed again. (A picture of this board is attached). The board is now being reviewed and updated on the 10th of each month. We are also putting the bound field books to use in this area also as a tool to help in this area. This shall resolve this issue.

(Section 10.0)

15.

As previously mentioned in 12. (c) above, the City has purchased the recommended bound field books to control, direct, and record each sampling event. These books shall be utilized for each specific IU/SIU at each sampling event to insure proper methods and procedures are used to take correct samples. Once the set up and needed information is input into the book's, a photo copy of each book will be sent to you. This should be completed by February 25, 2011.

(Section 10.0)

16.

The City has already started the review and changes to the ERP, and will continue to evolve the ERP as the new Ordinance's are put together. I expect this to be completed at the same time the Ordinance changes are submitted to EPA. This should be completed by June 30, 2011.

(Section 11.0)

17.

The City of Rock Springs has started using these attached forms, starting with the running violation list in each file, which is updated as a violation occurs, when a Self Monitoring Report is submitted, and at least once each month. This will also be applied to the tracking board mentioned previously, with due dates each month. We do use a Self Monitoring Report Check list to review each Self Monitoring Report submittal, and we are revising this check list to include the date the last SNC calculation was performed. The tracking board will also have the last SNC date and violation/enforcement review date. The City is working to correct this inadequacy in our program, and will have all the changes and procedures in place and implemented by January 28, 2010.

In the mean time each IU/SIU is being checked and reviewed every month to insure this is not missed. File review log sheets have been placed on my desk to keep this in view and at the top of our list.

(Sections 6.0 and 11.0)

Please let me know if any changes are required.

Sincerely



Randy Conner
Special Projects & Programs Coordinator
City of Rock Springs

CITY OF ROCK SPRINGS H₂S STUDY

Mini System	MH	10-4-10 am	10-5-10 pm	10-6-10 am	10-7-10 am	10-8-10 am	10-11-10 am	10-12-10 pm	10-13-10 pm	10-14-10pm	10-15-10 pm	10/18/10	10/19/10	11/8/10	11/9/10	11-18-10am	11-18-10pm	1
1	119														110			
1	120														130			
1	121																	
1	122			230				130				130						
1	123																	
1	128			80				80										
1	146			50				70										
1	149			50				60										
1	Main LS	110	80															
2	17				470				400									
2	48																60	
2	65																80	
2	108												90					
2	109												280					
2	114																90	
2	117														120			
2	135																80	
2	180																60	
2	181														130			
2	212												70					
2	241														100			
2	313														110			
3	31				180				130									
3	81																	
3	86																	
3	93																	
3	119														90			
3	120														90			
3	159														50			
3	209														110			
3	247																200	
3	258																100	
3	285																	
3	286																	
3	287																	
3	288																	
3	290																	
3	294																	
3	309																	
3	Swamp														160			
4	13				70				90									
4	126			70				110										
4	Plaza LS	60	40															
4	Sandstone LS	60	60															
5	201				70				100									
6	0				50				80									
7	0				60				120									
8	0					100				300								
8	3											110						
8	30															60		
8	36											80			90			
8	43															70		
8	91															60		
8	114															80		
9	0					90				90								
10	3					90				120								
10	34														100			
10	42					220				290								

[illegible]

MEMORIAL HOSPITAL OF SWEETWATER COUNTY

[illegible]

IU FILE REVIEW AND REQUIREMENTS CHECKLIST

NAME OF IU, SIU, CIU: _____
DATE REVIEW WAS STARTED: _____
TIME REVIEW WAS STARTED: _____
REVIEWED BY: _____

1. PERIODIC COMPLIANCE REPORT(S)/SELF MONITORING REPORTS

DATED: _____	DATED: _____	DATED: _____
DATED: _____	DATED: _____	DATED: _____
DATED: _____	DATED: _____	DATED: _____
DATED: _____	DATED: _____	DATED: _____

2. BASELINE MONITORING REPORTS

DATED: _____	DATED: _____
DATED: _____	DATED: _____

3. PERMIT APPLICATIONS

DATED: _____	DATED: _____
DATED: _____	DATED: _____

4. INDUSTRIAL WASTE SURVEY

DATED: _____	DATED: _____	DATED: _____
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5. PERMIT NUMBERS AND ISSUE DATES

NUMBER: _____	DATED: _____
NUMBER: _____	DATED: _____
NUMBER: _____	DATED: _____
NUMBER: _____	DATED: _____

6. CURRENT PERMIT REVIEWED

DATED: _____	DATED: _____	DATED: _____
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7. PERMIT MODIFICATIONS

DATED: _____	DATED: _____
DATED: _____	DATED: _____

8. IU CURRENT SELF MONITORING REQUIREMENTS

___ WEEKLY ___ MONTHLY ___ QUARTERLY OTHER: _____

9. FLOW METER CALIBRATIONS (IF REQUIRED)

DATED: _____	DATED: _____
DATED: _____	DATED: _____

CITY OF ROCK SPRINGS

INDUSTRIAL USER CONTACT REPORT CONVERSATION RECORD

TIME _____ DATE _____ LOCATION _____

INDUSTRIAL USER NAME _____ PERMIT # _____

TYPE: VISIT _____ CONFERENCE _____ TELEPHONE _____ INCOMING _____ OUTGOING _____

Name of Person(s) Contacted or in Contact with You _____

Telephone _____ Fax _____ Subject _____

Summary of Conversation _____

Action Required _____

Signature _____ Title _____ Date _____

Action Taken _____

Signature _____ Title _____ Date _____



Wastewater Treatment Plant [307] 352-1465
Building Inspections [307] 352-1541
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Department of Public Services

212 D Street, Rock Springs, WY 82901
Office [307] 352-1540 • FAX [307] 352-1545

October 20, 2010

Al Garcia
EPA Pretreatment Coordinator

I, Mike Gaviotis, City of Rock Springs Wastewater Superintendent, and designated signatory for the City of Rock Springs Industrial Pretreatment Program do authorize Randy Conner, City of Rock Springs Special Projects & Programs Coordinator to be the Industrial Pretreatment Program signatory on all permits, documents, forms, enforcement actions and all other aspects of the Industrial Pretreatment Program except the Annual Report.



Mike Gaviotis, Wastewater Treatment Plant Superintendent

Cc file



Wastewater Treatment Plant [307] 352-1465
Building Inspections [307] 352-1541
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Vehicle Maintenance [307] 352-1452

Department of Public Services
212 D Street, Rock Springs, WY 82901
Office [307] 352-1540 • FAX [307] 352-1545

September 22, 2010

Greg Penfold
Branch Manager
Tri-Mac Transportation.
1795 Blairtown Road
Rock Springs, WY 82901

CITY OF ROCK SPRINGS NOTICE OF VIOLATION

This **NOTICE OF VIOLATION** by **TRI-MAC TRANSPORTATION** of Rock Springs City Ordinance's Article 7-4, Section 7-403, Sub-Sections and Parts listed herein is being issued by the Special Projects and Programs Coordinator, of the City of Rock Springs pursuant to all relevant sections, sub-sections, and Parts of the Rock Springs City Ordinance's pertaining thereto.

THE SPECIAL PROJECTS AND PROGRAMS COORDINATOR FINDS THAT:

1. To prevent water pollution, pass through and/or interference of treatment facilities and or collection systems, and to abide by Federal and State Laws and Rock Springs City Ordinance's Article 7-4, Section 7-403 Sub-Section 1, Parts 1-01, 1-02, 1-03, 1-04, 1-05, require the City of Rock Springs to administrate and enforce an Industrial Pretreatment Program.
2. As per definitions in Rock Springs City Ordinance's Article 7-4, Section 7-403, Sub-Section 2, Parts 2-01 through 2-48.
3. These laws and ordinances are designed to protect the Rock Springs City Wastewater Collection Systems, Wastewater Reclamation Facility, and the Public. Article 7-4. Section 7-403. Sub-Section 3. Parts 3-04, 3-07, Sub Section 4. Parts 4-01, 4-02, 4-03.
4. Under these requirements, **TRI-MAC TRANSPORTATION** was issued a permit in response to a permit application to discharge, from **TRI-MAC TRANSPORTATION**, in which set discharge limits and special monitoring and reporting requirements were described and made mandatory, as per City Ordinances, Article 7-4. Section 7-403. Sub-Section 3. Part 3-06, Sub-Section 4. Part 4-03. Sub-Section 6. Part 6-01, Sub-Section 7. Parts 7-01, 7-02, 7-03, 7-05, 7-07. Sub-Section 8, Parts 8-02, 8-03, 8-04, 8-05.
5. That at no time was public health determined to be in immediate danger due to the violations listed herein by **TRI-MAC TRANSPORTATION** discharge.
6. That **TRI-MAC TRANSPORTATION** did discharge high concentrations of Cadmium (Cd) on 9 separate events, 1 Zinc (Zn), and 2 low pH events to the City of Rock Springs through and or into the City Collection System, which ultimately goes to the City of Rock Springs Wastewater Treatment Plant.

7. That **TRI-MAC TRANSPORTATION** did not sample and report for Chrome Hex/VI (Cr Hex/VI) 7 times as required on page 2 of the permit issued on November 2, 2009.
8. That **TRI-MAC TRANSPORTATION** did fail to provide several 24 hour required notifications, and 10 or more required written five (5) day reports for each Local Limits violation listed herein.
9. The City of Rock Springs has determined that **TRI-MAC TRANSPORTATION** is per City of Rock Springs Ordinance, a Significant Industrial User, (SIU). The SIU determination was made because of the possible type and volume of discharge flow, and the possibility of **TRI-MAC TRANSPORTATION** to cause interference and pass through at the Wastewater Treatment Plant and or problems in the City Collection System, because of the concentrations, type of process, and possible nature of the discharge.
10. That **TRI-MAC TRANSPORTATION** did violate the following City of Rock Springs Ordinance Article 7-4, Section 7-403, Sub-Section 24. and all other Sections, Sub-Sections, and Parts as listed below:

ITEM OR DESCRIPTION OF VIOLATIONS:	NUMBER OF VIOLATIONS	DAYS IN VIOLATION	TOTAL # OF VIOLATIONS
A. Had one (1) late Self Monitoring Report (SMR) due on 12-10-09 and was received on 12-22-09 in Violation of City Ordinances Article 7-4, Section 7-403,	1	x 12	12
B. Did discharge Cadmium (Cd) values over the Permitted Limit of 0.005 mg/l on 11-16-09 of 0.007 mg/l, 12-14-09 of 0.016 mg/l, 01-04-10 of 0.020 mg/l, 02-01-10 of 0.007 mg/l, 03-03-10 of 0.032 mg/l, 04-02-10 of 0.013 mg/l, 05-06-10 of 0.028 mg/l, 06-07-10 of 0.076 mg/l, 07-08-10 of 0.156 mg/l, in Violation of City Ordinances Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 4, Part 4-02 (f)(g). Sub-Section 7. Parts 7-01 (b), 7-02, 7-05, 7-07	9	x 204 =	1836
C. Did discharge Zinc (Zn) value over Permitted Limit of 7.18 mg/l on 07-08-10 of Zinc (Zn) 13.4 in violation of City Ordinances Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 4, Part 4-02 (f)(g). Sub-Section 7. Parts 7-01 (b), 7-02, 7-05, 7-07	1	x 30 =	30
D. Did not test for Chrome Hex/VI (Cr Hex/VI) as required in the Permit issued on November 2, 2009. Violations occurred on 02-05-10, 03-05-10, 04-05-10, 05-05-10, 06-05-10, 07-05-10, 08-05-10 in violation of City Ordinances Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e), Sub-Section 7, Part 7-01, 7-02, Sub-Section 8. Parts 8-02, 8-03 (c)(h), Part 8-04 (e)(g) Sub-Section 11, Part 11-01, (a), (e), (e)2(d), Part 11-02.	7	x 210 =	1470
E. Violation of the City pH Local Limit of > 5.0, (no pH less than 5.0) on 07-08-10 pH 4.95, and 07-14-10 pH 3.75 (City test) as per Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e), Sub-Section 4, Parts 4-01, 4-02 (a)(c), Sub-Section 7 Part 7-01 (b), Sub-Section 8, Part 8-02.	2	x 2 =	4

F.	Failure to provide notification of a Violation within 24 Hour's of awareness on 01-04-10, 02-01-10, 05-06-10 as per Ordinance's Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 17., Part 17-06. (2).	3		90	=	270
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G.	Failure to provide written notification of a Violation within five (5) days of awareness the Local Limits Violations as listed in A., B., D. above, and as per Ordinance's Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (e) Sub-Section 8. Part 8-04 (e)(g)(i)(j)(k), Sub-Section 11. Part 11-02	3		90	=	270
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H.	Did violate the prohibited Discharge standards and Requirements in the City Ordinance Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e), Sub-Section 4, Part 4-02 (a),(c)	2	x	31	=	62
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TOTAL NUMBER OF VIOLATIONS		28		to		3954
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Calculated Minimum Administrative Penalty Amount is $3954 \times \$50.00 = \$197,700.00$

Calculated Maximum Administrative Penalty Amount is $3954 \times \$200.00 = \$790,800.00 +$

(Violations X Penalty Amount/Violation = Admin. Penalty)

(Article 7-4. Section 7-403. Sub-Section 3. Part 3-14. (i) and Sub-Section 27. Part 27-06 (a)(b)(c)(d)

11. **TRI-MAC TRANSPORTATION** has significantly violated the City of Rock Springs Ordinance's, the Permit requirements, Pretreatment Program Local Limits, specific prohibitions and requirements therein, and pertaining thereto, which meets the definition of Significant Violation's and thus places **TRI-MAC TRANSPORTATION** in Significant Non-Compliance (SNC) because of the multiple violation during this period, as per Article 7-4. Section 7-403. Sub-Section 27. Parts 27-02, 27-02 (a) (g) (h),
12. That **TRI-MAC TRANSPORTATION** did not receive any notable economic benefit by these violations.
13. That the City of Rock Springs does not believe that recalcitrance is a factor in these violations, because **TRI-MAC TRANSPORTATION** has made every effort to resolve these violations as they occurred to date.
14. That no un-controllable circumstances have initiated and contributed to cause these violations. All actions taken by **TRI-MAC TRANSPORTATION** did cause these violations.
15. That this is the first such violations of this nature by **TRI-MAC TRANSPORTATION** and a Notice of Violation is hereby being issued to **TRI-MAC TRANSPORTATION** as per Article 7-4. Section 7-403. Sub-Section 24. Part 24-01.

THEREFORE, BASED ON THE ABOVE FINDINGS, THE TRI-MAC TRANSPORTATION IS HEREBY NOTIFIED THAT:

1. These violations by **TRI-MAC TRANSPORTATION** have forced the City to take formal enforcement action towards **TRI-MAC TRANSPORTATION** for being in Significant Non-Compliance (SNC). Article 7-4. Section 7-403. Sub-Section 3. Part 3-07 (e). Sub-Section 27. Part 27-02 (a)(g)(h).

2. At this time the City of Rock Springs will not assess **TRI-MAC TRANSPORTATION** administrative penalties as set forth by the City of Rock Springs Special Projects & Programs Coordinator in compliance with program procedures. Article 7-4. Section 7-403. Sub-Section 3. Part 3-07 (e). Part 3-14 (i). Sub-Section 12. Parts 12-01, 12-02, 12-03. Sub-Section 26. Sub-Section 27. Part 27-06, unless the violations and the cause of the violations are not resolved as required herein by October 29, 2010.
3. **TRI-MAC TRANSPORTATION** shall immediately cease discharge from the wash bay and it's outside Oil/Sand Interceptor Unit as required by the City as per Article 7-4. Section 7-403. Sub-Section 3. Part 3-07 (b)(c), Sub-Section 4-03. Part 4-03 (c), Sub-Section 22. Parts. 22-02, 22-03.. This must occur upon receipt of this letter. The discharge line of the Outside Oil/Sand Interceptor Unit must have a glued cap installed within 24 hours of receipt of this letter. (This was verbally explained and requested of **TRI-MAC TRANSPORTATION** on 08-16-10 which has been complied with as of 08-20-10).
4. **TRI-MAC TRANSPORTATION** shall provide written documentation of its plans to prevent these types of violation's from re-occurring, including dates of implementation & completion to include written standard operating procedures and preventative procedures. This must include the type of treatment intended to be used which shall meet City Local Limits on a continuous basis as per Article 7-4. Section 7-403. Sub Section 3. Part 3-13, Sub-Section 20. Part 20-01. This information must be provided by October 4, 2010
5. A new permit shall be issued to **TRI-MAC TRANSPORTATION** with new discharge requirements if the conditions of this NOV are followed and met and approved by the Special Projects & Programs Coordinator.
6. **TRI-MAC TRANSPORTATION** shall post notices at the facility for emergency notification procedures to the City in case of a violation or a slug load discharge, or an accidental spill, within 10 days of this notice. This notice must have contact numbers and be performed immediately upon notice of occurrence, and require written follow up within five days. This must be done by October 1, 2010
7. That **TRI-MAC TRANSPORTATION** status of being in Significant Non-Compliance shall be posted in the local newspaper as per compliance with program procedures.
8. Failure to prevent future violations of this nature, of the City of Rock Springs Ordinance's may result in escalation to more stringent enforcement action by Rock Springs City including, but not limited to the IMPOSITION OF FURTHER ADMINISTRATIVE, CIVIL AND/OR CRIMINAL FINES AND PENALTIES, and or CEASATION OF SERVICES.

Sincerely

Randy Conner
Special Projects and Programs Coordinator

cc: Mike Gaviotis, Wastewater Treatment Plant Superintendent
Vince Crow, City Attorney
Vess Walker, Director of Public Services
File

Referenced Ordinance Articles, Sections, Sub-Sections, Parts, Sub-Parts:

Article 7-4, Section 7-403 Sub-Section 1, Parts 1-01, 1-02, 1-03, 1-04, 1-05
Article 7-4, Section 7-403, Sub-Section 3, Parts 3-04, 3-07, Sub Section 4, Parts 4-01, 4-02, 4-03.
Article 7-4, Section 7-403, Sub-Section 2, Parts 2-01 through 2-48.
Article 7-4, Section 7-403, Sub-Section 3, Part 3-06, Sub-Section 4, Part 4-03, Sub-Section 6, Part 6-01,
Sub-Section 7, Parts 7-01, 7-02, 7-03, 7-05, 7-07, Sub-Section 8, Parts 8-02, 8-03, 8-04, 8-05.
Article 7-4, Section 7-403,
Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e), Sub-Section 4, Part 4-02 (f)(g).
Sub-Section 7, Parts 7-01 (b), 7-02, 7-05, 7-07
Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e), Sub-Section 4, Part 4-02 (f)(g).
Sub-Section 7, Parts 7-01 (b), 7-02, 7-05, 7-07
Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e), Sub-Section 7, Parts 7-01, 7-02,
Sub-Section 8, Parts 8-02, 8-03 (c)(h), Part 8-04 (e)(g)
Sub-Section 11, Parts 11-01, (a), (e), (e)2(d), Part 11-02.
Article 7-4, Section 7-403, Sub-Section 3, Part 3-07, (b) (e), Sub-Section 4, Parts 4-01, 4-02.(a)(c).
Sub-Section 7, Part 7-01 (b), Sub-Section 8, Part 8-02.
Article 7-4, Section 7-403, Sub-Section 3,
Part 3-07 (b) (e), Sub-Section 17, Part 17-06, (2).
Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (e), Sub-Section 8,
Part 8-04 (e)(g)(i)(j)(k), Sub-Section 11, Part 11-02.
Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e), Sub-Section 4, Part 4-02 (a)(c).
Article 7-4, Section 7-403, Sub-Section 3, Part 3-14, (i) and Sub-Section 27, Part 27-06 (a)(b)(c)(d)
Article 7-4, Section 7-403, Sub-Section 27, Parts 27-02, 27-02 (a) (g) (h),
Article 7-4, Section 7-403, Sub-Section 24, Part 24-01.
Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b)(c), Sub-Section 4-03, Part 4-03 (c).
Sub-Section 22, Parts 22-02, 22-03.
Article 7-4, Section 7-403, Sub Section 3, Part 3-13, Sub-Section 20, Part 20-01.
Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (e), Sub-Section 27, Part 27-02 (a)(g)(h).
Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (e), Part 3-14 (i), Sub-Section 12, Parts 12-01, 12-02, 12-03.
Sub-Section 26, Sub-Section 27, Part 27-06,



Wastewater Treatment Plant [307] 352-1465
Building Inspections [307] 352-1541
Planning and Zoning [307] 352-1540
Vehicle Maintenance [307] 352-1452

Department of Public Services
212 D Street, Rock Springs, WY 82901
Office [307] 352-1540 • FAX [307] 352-1545

September 30, 2010

Trin Maycock
District Manager
Weatherford Enterra
6401 Foothil Blvd.
Rock Springs, WY 82901

LETTER OF NOTIFICATION

A compliance review of your file for the past 6 quarters has shown these violations:

2nd quarter 2009 violation noted on Self Monitoring Report (SMR):
Cu limit exceeded 06-03-09 (1.57 mg/l)(1.06 mg/l limit).

Reporting problems noticed:

1. Failure to notify the City within 24 hours of the reported violation as required.
2. Failure to notify the City within 5 days with a written letter regarding the violation as required.
3. Flow data sheets need to be more professional and readable.

There was also a recent testing event where your lab SPL tested for Cadmium (Cd) and used the actual Permit limit as their detection value or MDL, and reported this value. You must test below the Permit limit to show you are in compliance, if you report a value at the Permit limit you are in violation. Even if this is a lab error, it is still a violation you are responsible for.

There are concerns with the use of an additive which contains chlorine product, this product inhibits the proper testing of volatile samples, and we are concerned that you were using this in a quantity large enough to cause this problem.

It is noted from our review that you have made efforts to remedy most of these concerns prior to this notice, the Cu violation, the location of the parts washer and the anti-freeze tote over the floor drain trench in the center north side of the shop were corrected immediately upon notification.

Please note that a tote of any material should be able to be containment for spills or accidents, especially if the material is stowed in an area where it can enter a drain or the treatment system. The tote and parts washer must be placed far enough from any drain so as to allow spill cleanup materials to be used before it gets into a drain in case of a spill.

The operation and maintenance (O&M) of your treatment system should be reviewed, at the time of this visit there were leaking hoses on the system, (currently repaired), the system looked dirty, the area was dirty, stuff was scattered and left lay. There were questionable oil and sludge removal procedures being used on site, these should be reviewed. A procedures or operational manual should be available near the system.

We also feel that the management staff could be more aware of how the system operates, how it is sampled, how it is

CHAIN OF CUSTODY RECORD
CITY OF ROCK SPRINGS
212 D STREET, ROCK SPRINGS, WY 82901

DATE OF SAMPLE:						SAMPLERS NAME:								SAMPLERS SIGNATURE:								
SAMPLE INFORMATION										ANALYSIS REQUESTED												
SAMPLE NUMBER	SAMPLING SITE/LOCATION	SAMPLE START TIME	SAMPLE STOP TIME	COMP	GRAB	pH	TEMP	FLOW INT/CONT	TREAT CODES	BOD	TSS	TPH	BETX	BENZENE	VOC 624	VOC 625	Cl	CN	Ag	As	Be	
SPECIFIC INSTRUCTIONS OR TEST REQUIREMENTS																						
TREATMENT CODES 1 UU Unfiltered Unpreserved 2 HNO ₃ Nitric Acid Ph<2 3 HCL Hydrochloric Acid 4 C Chilled 4° C 5 H ₂ SO ₄ Sulfuric Acid 6 O Other (specify in Remarks) 7 UP Unfiltered & Preserved 8 NaOH Sodium Hydroxide 9 CL ₂ Chlorinated									OTHER OBSERVATIONS: (circle as appropriate, list sample number in comments) APPEARANCE OF DISCHARGE: CLEAN, COLORED, OIL, FLOATING DEBRIS, ALGAE, BUBBLE, AND/OR ODOR OF DISCHARGE: NONE, ACRID, H ₂ S, SOLVENT, ROTTEN, GASOLINE, DIESEL, STRONG / SLIGHT, OTHER COMMENTS: 													
Relinquished by: (Signature)				DATE		TIME		Received by (Laboratory) : (Signature)						DATE		TIME						
Relinquished by: (Signature)				DATE		TIME		Received by (Laboratory) : (Signature)						DATE		TIME						
Relinquished by: (Signature)				DATE		TIME		Received by (Laboratory) : (Signature)						DATE		TIME						

DISTRIBUTION: Original (White) to Industrial User File; First Copy (Yellow) Coordinators log file; Second Copy (Pink) Accompanies Shipment; Third Copy (G

(REVISION DATE 12-13-00)

CITY OF ROCK SPRINGS

WASTE WATER DISCHARGE CONTRIBUTION PERMIT

PERMIT NUMBER: 03-07-043

Industrial User: HALLIBURTON ENERGY SERVICES

Division or District Name (if applicable): Rock Springs Division

Mailing: 1801 BLAIRTOWN ROAD, ROCK SPRINGS WY 82901
Address: Street or P.O. Box City, State Zip Code

Facility: 1801 BLAIRTOWN ROAD, ROCK SPRINGS, WY 82901 382-3484
Address: Street Address City, State Zip Phone

HALLIBURTON ENERGY SERVICES is authorized discharge of industrial waste water to the City of Rock Springs Collection systems and wastewater treatment plant in compliance with the Rock Springs City Ordinance's, and or regulations, and or any applicable provisions of Federal or State laws or regulations, and in compliance with discharge permit and sampling point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

This permit is being issued pursuant to City of Rock Springs Ordinances Article 7 Section 7-403 and the Pretreatment Program Requirements.

Effective Date: JUNE 12, 2009

Expiration Date: JUNE 12, 2011


Special Projects and Programs Coordinator

JUNE 12, 2009
Date

HALLIBURTON ENERGY SERVICES
Company Name


Printed Name of Person Receiving Permit


Signature of Person Receiving Permit

JUNE 12, 2009
Date Received

NOTE:

THE PERSON WHO SIGNS AS RECEIVING THIS PERMIT IS STATING THAT THEY HAVE READ AND UNDERSTAND THIS PERMIT DOCUMENT. THIS IS NOT A CONTRACT NOR AN AGREEMENT. THIS IS A PERMIT ALLOWING YOUR FACILITY TO DISCHARGE TO THE CITY WASTE TREATMENT SYSTEM UNDER SPECIFIC CONDITIONS AND REQUIREMENTS.

PART I Discharge Limitations and Monitoring Requirements

Beginning on the effective date of the permit, the Industrial User shall sample from the designated sampling point in accordance with the required frequency listed below and shall comply with effluent limitations described below.

<u>PARAMETER</u>	<u>DISCHARGE LIMITATIONS</u>	<u>SAMPLING REQUIREMENTS</u>	
	<u>DAILY MAXIMUM mg/l</u>	<u>TEST FREQUENCY</u>	<u>SAMPLE TYPE</u>
pH	5.0 OR ABOVE	EACH SAMPLE	GRAB+
TSS	7603 mg/l	QUARTERLY	COMPOSITE*
Cd	<0.005 mg/l	QUARTERLY	COMPOSITE*
Cu	1.06 mg/l	QUARTERLY	COMPOSITE*
Pb	1.81 mg/l	QUARTERLY	COMPOSITE*
Mo	0.245 mg/l	QUARTERLY	COMPOSITE*
Ni	2.92 mg/l	QUARTERLY	COMPOSITE*
Se	0.18 mg/l	QUARTERLY	COMPOSITE*
Zn	7.18	QUARTERLY	COMPOSITE*
BETX (total of all 4)	750 ug/l	QUARTERLY	GRAB+
Benzene	50 ug/l	QUARTERLY	GRAB+
TPH	100 mg/l	QUARTERLY	COMPOSITE*

Modified Parameter List, removed BOD, CHLORIDE, As, Be, Cr (TOTAL), Cr (VI/HEX), Hg, Ag, DRO on 12-10-07

Modified Testing Frequency to Quarterly on 12-10-07

Modified facility total flow data collection process 07-14-08

SPECIAL SAMPLING, TESTING, MONITORING NOTES & EXPLANATIONS:

- ± The grab sample is taken one time at a specified sampling point only. Sample must not be taken at the same time and day of week, times and days must alternate consistently.
 - * The composite sample shall consist of (at a minimum) (4) four samples taken at equal intervals over the duration of the daily discharge. If an industry discharges 24 hours a day, four samples taken at 6 hour intervals should be taken. The samples shall be of equal amounts and samples shall be combined to make a composite sample. These samples shall be taken during production hours.
 - ** Fats, Oils & Greases, Total Petroleum Hydrocarbons (TPH) may cause an interference, or blockage in the wastewater collection system. It is the sole responsibility of the Industrial User Named on page (1) one of this permit to maintain interceptors, sumps, and grease traps where needed to comply with Rock Springs City Ordinance's.
1. Since the operation of this system is continuous, it is important that Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. The sampling and analysis maybe handled by a certified private contractor and laboratory on a pre-arranged basis. The Industrial User is still responsible for compliance.
 2. *A field pH reading shall be taken with a documented calibrated device at the time a sample is taken and recorded on the Monthly Self Monitoring Report. An electronic pH meter shall be used. A calibration and certification statement must be provided for each sample event. These shall accompany the Monthly Self Monitoring Report.*
 3. All parameters tested for must use a Minimum Detection Limit (MDL) below the permit parameter Daily Maximum discharge limit. The lowest detection point possible must be used for Cd and Hg, (Cadmium 0.001 and Mercury 0.0002). The Industrial User named in this permit shall insure that all analysis results must show the Minimum Detection Limit (MDL) used. PQL's, MCL's and all other values of measurement will not be acceptable.

4. All samples shall be taken and analyzed in accordance with 40 CFR Part 136, using proper sampling techniques, required MDL's, and methods, and at the designated sampling point listed herein. The Industrial User named in this permit is responsible for insuring they, their contractor, and the laboratory they use is complying with the requirements of their permit and 40 CFR Part 136.

IMPORTANT REQUIREMENTS AND RECOMENDATIONS

1. The only recognized sampling point shall be the manhole at the northwest side of the maintenance building. This manhole is located at the North West Corner, on the edge of the concrete, just north of the dry storage part of the building. It is the manhole that is closest to edge of the apron and before the next building to the West of the main building. The manhole top is painted green.
2. Samples shall be taken of all flows leaving this manhole, and shall only be taken during normal operations.
3. The routine monthly sampling event should occur in the first 5 days of the sampling period. This will help leave time to address any violation of limits or parameters. It is strongly recommended that the Industrial User require their laboratory to provide a 12 to 15 day turn-around time.
4. Any and all forms, compliance data, or special data and reports, which are specifically requested, are required to be delivered within ten days from the date of receipt of the request.
5. The Industrial User, or Facility shall be required to meet Federal, State standard, conditions, or local limits and ordinances, depending upon which ever are more stringent with each parameter, or situation.
6. *The facility shall clean their wash bay sumps and Ultracapt treatment system at least once per quarter. The City special Projects & Programs Coordinator must be notified when sumps are being cleaned. (Random sump and treatment system inspections will occur).*
7. **Water Meter and/or Flow Meter Requirements:**
 - A. Halliburton Energy Services shall install, by **APRIL 30, 2007**, and maintain in good working condition, a discharge flow meter which reads in gpm, on the discharge lines of the treatment systems used for the wash bays.
 - B. The meter shall be calibrated every six (6) months and a copy of the calibration shall be provided with each July and December Monthly Self Monitoring Report, (SMR).
 - C. The Wash Bay discharge meter readings shall be taken on a daily basis and recorded on the form provided by the City.
 - D. The facility inlet water usage and water meter readings, (for the entire facility), shall be taken off of the monthly City water billing and recorded on the form provided by the City. These forms/reports shall accompany the Monthly Self Monitoring Reports. These will be considered flow meter readings for this facility.
 - E. A wash bay water meter reading, (flow value), shall be taken for the duration of the sampling period, (a minimum of one (1) hour period), at the time of taking a sample, the meter readings and flow value from this period shall be reported on Self Monitoring Report where required.

PART II SPECIAL CONDITIONS

1.
 - A. The Industrial User shall provide to the City of Rock Springs, and use the approved Spill Control Counter-measure Plan, (Spill prevention plan), and an Accidental Slug Prevention Plan to eliminate or minimize the accidental discharge of pollutants into the sewer system. This plan must cover the entire facility, specifically the wash bays. This plan shall be updated yearly, and a new copy provided to the City of Rock Springs. The Initial Plan is due by **APRIL 23, 2007**.
 - B. For the purposes of this requirement a slug discharge is any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge. The results of such activity shall be available to the Approval Authority upon request.
 - C. The Industrial User shall post signs in the wash bays which state no dumping or rinsing out of tanks, bins, etc...

- D. The Industrial User shall provide a monthly maintenance and inspection log performed by Halliburton for the Ultracapt Treatment Systems. This log shall accompany the Monthly Self Monitoring Reports.

2. **Procedures for Limits Violations:**

- A. If the analytical results of sampling performed by the Industrial User show a violation, the Industrial User shall follow the reporting requirements in Part III, Number 3. A,B,C of this permit.
- B. *Understanding that the turn-around time span needed for the required routine monthly sampling and reporting by the Industrial User, should readily allow for a repeat sampling of a violated limit during the month. There will be required repeat sampling and analysis by this Industrial User.*
- C. The Industrial User should make every effort to resample and analyze any violated limits to reduce the number of days in violation of any parameter(s). Violations responses are calculated as: Violations X Days X Penalty Amount

PART III REPORTING REQUIREMENTS

NOTE: Noncompliance in reporting is a violation of Rock Springs City Ordinance's and can result in administrative and/or civil penalties.

1. **Accidental Slug or Spill Reporting Requirements:**

- A. The Industrial User shall notify the City of Rock Springs Special Projects & Programs Coordinator, Wastewater Plant, and or the Police Department, immediately upon any accidental spill or slug discharge to the sanitary sewer as outlined in the Accidental Spill and Slug section of the City Ordinance's.
- B. Formal written notification discussing circumstances and remedies taken by the Industrial User shall be submitted to the City of Rock Springs Special Projects & Programs Coordinator within 5 days of the occurrence.
- C. A notice shall be permanently posted in a prominent place at the Industrial Users facility advising employees of whom to call in the event of an accident, spill or slug discharge. The break room and wash bay are considered prominent places.

2. All reports shall be submitted to the following address: City of Rock Springs, Special Projects & Programs Coordinator 212 D Street, Rock Springs, WY 82901

3. **Operational, Process and Violation Reporting Requirements:**

- A. The City of Rock Springs Special Projects & Programs Coordinator shall be notified within twenty four (24) hours, or at the time of the Industrial Users first awareness of the commencement of any failure to meet and limit, monitoring, sampling, or reporting requirements, or of any non-compliance issue or conditions experienced by the Industrial User of its treatment system, process or discharge that places it in violation with the discharge limitations or conditions contained in this permit, or other requirements specified by the City, and or other problems which place the Industrial User in violation. A phone call must be made for each time a violation has occurred. Each analysis results, which show a limit has been exceeded is a separate violation.
- B. A detailed report shall be filed to the City within (5) five days of the verbal notification.
- C. Failure to report a violation is a separate and additional violation.
- D. The Industrial User must immediately do whatever it can to stop the discharge which is causing the violation.

4. **Self Monitoring Reports (SMR):**

- A. The Industrial User shall submit to the City, Monthly Self Monitoring Reports showing results of its sampling of the pollutants specified in Part I and Part II of this permit.
- B. The Industrial User shall use the Self Monitoring Report Forms Provided by the City of Rock Springs Special Projects & Programs Coordinator. These reports will be submitted by the (10th) tenth day of the first month of every MONTH beginning with the May 10, 2007 date. Sampling must be done for the Month of MAY 2007, which analysis results will be due the 10th day of JUNE 2007. The next due date will be July 10th, August 10th, and so on.
- C. The Industrial user shall attach all laboratory analysis, to include all test methods and MDL's used by the laboratory, and the Laboratory Certification Statement to each Monthly Self Monitoring Report (SMR).
- D. The monthly water meter readings shall be attached to each Monthly Self Monitoring Report (SMR).

- E. A completed, (signed and dated by sender and each receiving lab) chain of custody report shall accompany all analysis reports of each sample sent. The chain of custody will show the name of the sampler. The chain of custody shall show who received the sample and when. The laboratory must return a signed copy of the chain of custody to the Industrial User with their analysis report.
 - F. Failure to submit Monthly Self Monitoring reports by the (10) tenth of the following month is a significant non-compliance violation of which will invoke the use of administrative penalties up to the maximum daily amount and possible escalating enforcement actions for each day the report is late.
- 5. The Industrial User will be required to sample its wastewater for pollutants specified in Section I, and report compliance, non-compliance, Any reasons for not complying, and any steps being taken by the user to comply.
 - 6. The Industrial User shall notify the City Special Projects & Programs Coordinator prior to introduction of new wastes or water pollutants or substantial change in the volume or characteristics of the wastewater being discharged from their processes.

PART IV STANDARD CONDITIONS

- 1. The Industrial User shall comply with all the general and specific prohibitive discharge standards of the Rock Springs City Ordinance's Article 7-4, Section 7-403.
- 2. **RIGHT OF ENTRY:** The Industrial User shall allow City representatives, exhibiting proper credentials and identification, to enter upon the premises of the Industrial User, and enter the Industrial User's Facility, at all reasonable hours, for the purposes of inspection, sampling, monitoring, or records inspection, for the purpose of monitoring compliance with this permit and City Ordinances. Reasonable hours in the context of inspection and sampling includes any time the Industrial User is operating any process which results in a process waste water discharge to the Rock Springs City wastewater collection system.
- 3. **RECORDS RETENTION:**
 - A. The Industrial User shall retain and preserve for no less than three (3) years records, books, documents, memoranda, reports, correspondence and any and all summaries thereof, relating to monitoring, sampling and chemical analyses made by or in behalf of the Industrial User of its discharge.
 - B. All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by Rock Springs City shall be retained and preserved by the Industrial User until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired. (Minimum of 3 yrs)
- 4. **CONFIDENTIAL INFORMATION:** Except for data determined to be confidential under of the Rock Springs City Ordinance's, all reports required by this permit shall be available for public inspection at the office of the Projects & Programs Director, 212 D Street, Rock Springs, WY 82901.
- 5. **RECORDING OF RESULTS:** For each measurement or sample taken pursuant to the requirements of this permit, the Industrial User shall record the following information:
 - A. The exact place, date, time of sampling, sampler name.
 - B. Dates of analyses, Lab name, analyst.
 - C. The analytical techniques, methods used, and the results of all required analyses.
 - D. The flow at the time of sampling, either water meter or flow meter results as required, and the monthly Flow total in MGD, if there is an on site flow meter, if not than the water meter will be used for the flow at the time sampling and the total flow and those required daily recorded readings.
- 6. **DILUTION:** The Industrial User shall not increase the use of potable or process water or, in anyway, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

7. **PROPER DISPOSAL OF PRETREATMENT SLUDGE'S AND SPENT CHEMICALS:**
The disposal of sludge's and spent chemicals generated shall be done in accordance with Section 405 of the 1986 Clean Water Act (40 CFR) and Subtitles C and D of the (R.C.R.A.) RESOURCE CONSERVATION AND RECOVERY ACT.
8. **SIGNATORY REQUIREMENTS:** All reports required by this permit shall be signed by a principal executive officer of the Industrial User, or his designee, in the representative capacity to the Industrial User (i.e. president, partner, etc.). Note that the Industrial User's designee must be stated so in writing, and delivered to Rock Springs City.
9. **REVOCATION OF PERMIT:** The permit issued to the Industrial User by Rock Springs City may be revoked when; after inspection, monitoring or analysis, it is determined that the discharge of waste water is in violation of the conditions of this permit. Or are in violation of federal, state, or local laws, ordinances, or regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any other required reporting form or sampling data, or failure to submit in the required timely manner the reports required in all the permit parts shall be cause for permit revocation. Refusal of reasonable access to the Industrial User premises for the purpose of inspection, monitoring or sampling and or failure to comply shall be reason for permit revocation. Nonpayment of surcharges, permit fees, sampling charges, or penalties for violations, Shall be cause for Revocation.
10. **LIMITATION ON PERMIT TRANSFER:** Waste water discharge permits are issued to a specific Industrial User's for a specific operation and period of time, and are not assignable to another Industrial User or transferable to any other location without the prior written approval of Rock Springs City. Sale of a facility by the Industrial User, shall obligate the Purchaser to seek prior written approval of Rock Springs City for continued discharge to the waste water collection system.
11. **FALSIFYING INFORMATION/TAMPERING WITH MONITORING EQUIPMENT:**
Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, may result in punishment under the criminal laws of Rock Springs City, as well as being subjected to civil and or criminal action, and or penalties and relief.
12. **MODIFICATIONS AND OR REVISION OF THE PERMIT:**
A. The terms and conditions of this permit may be subject to modification by Rock Springs City at any time. Modifications may be made as a result of changes in limitations or requirements of Rock Springs City's Ordinance, or from any other just cause.
B. The terms and conditions may be modified as a result of the State of Wyoming or the EPA promulgating a new State or Federal Pretreatment Standard or Requirement.
C. Any permit modifications which result in new conditions in the permit shall include a reasonable time schedule for compliance if necessary.
13. **DUTY TO REAPPLY:** Rock Springs City may notify the Industrial User within ninety (90) days prior to the expiration of the Industrial User's Permit. The Industrial User shall reapply for renewal of the permit on the permit application form provided by the City. (Note: A completed Baseline monitoring report and Industrial User Survey form must accompany permit application). The deadline for permit renewal is 30 days prior to the expiration date on your permit. Failure to apply for permit renewal prior to the expiration date shall be cause for higher renewal fee for late submittal of permit application. If a new permit is not issued before the expiration date of the old permit, then you may no longer discharge, (Unless otherwise informed in writing by the Special Projects & Programs Coordinator), or until a new permit is issued by Rock Springs City. All necessary forms are available at the City of Rock Springs, Special Projects & Programs Coordinators office.
14. **SEVER-ABILITY:** The provisions of this permit are sever-able, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, of the remainder of this permit shall not be affected.
15. **PROPERTY RIGHTS:** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges; nor does it authorize any invasion of personal rights, nor any infringement of Federal, State or Local regulations.

16. **FEES AND CHARGES:** All costs associated with this permit shall be paid by the Industrial User named in this permit, including sampling and analytical costs incurred by Rock Springs City in conjunction with this permit.
- A. The Industrial User shall be responsible to arrange for and pay all costs associated with sampling and laboratory analysis whether the industrial user takes the sample or the City takes the sample.
 - B. A Violation of this permit shall be cause to invoke a fine of up to \$ 1,000.00 ONE THOUSAND DOLLARS PER VIOLATION PER DAY, and/or other penalties as required.
 - C. All charges and/or fee's, shall be paid in full by the Industrial User named in this permit within 30 days of billing. Failure to do so will be considered a violation of this permit.
 - D. The Industrial User shall pay a permit fee of \$ 300.00 at time of permit issue. **(\$ 100.00/year).**
 - E. Costs associated with cleanup, or reparation for damage, shall be the Industrial Users responsibility.
17. **THE SPECIAL PROJECTS AND PROGRAMS COORDINATOR MAY SUSPEND, STOP OR BLOCK THE DISCHARGE FROM THE INDUSTRIAL USER NAMED IN THIS PERMIT IF:**
- A. There is the possibility of harm or blockage to the City Collection System or Treatment Facility,
 - B. If there are un-resolved compliance issues.
 - C. If the Industrial Users has failed or refused to comply with the City Ordinance, Pretreatment Program, or Permit.
 - D. It is in the best interest of the City to not continue to receive a discharge from this Industrial User.
18. **MISCELLANEOUS INFORMATION:**
- A. A sign off sheet will or has been used to signify knowledge of requirements and paperwork. (Copies available upon request).
 - B. The permitted Industrial User named in this permit shall be responsible for compliance and any violations.
 - C. Failure to comply or meet the conditions of this permit will result in escalating enforcement actions and penalties, for each violation.

ROCK SPRINGS CITY SELF MONITORING REPORT CHECKLIST

(for IU's, SIU's and CIU's)

Time Completed: 15:00

Date Completed: 10-2-09

Completed by: RANDY CONNER

Title: SPECIAL PROJECTS AND PROGRAMS COORDINATOR

Name of IU, SIU, CIU: HALLIBURTON ENERGY SERVICES

Permit Number: 03-07-043

1. Was report received on time ? YES NO
2. If no to # 1 how many days late was report: _____
3. Reason given for late report: _____
4. Was SMR form completed ? YES NO
If no list missing data: _____
5. Was all required testing laboratory information provided ? YES NO
6. Are flow data sheet(s) attached ? YES NO
7. If flow meter calibration required was certification statement attached ? YES NO N/A
8. Were all permit required parameters tested for ? YES NO
9. Were required EPA test methods used ? YES NO
10. Were required MDL's used ? YES NO
11. Were tested parameters reported on SMR ? YES NO
12. Were any parameter violations noted from review ? _____ YES NO
13. Are copies of Lab analysis results attached ? YES NO
14. Were sample date, sampling time and control number on form ? YES NO
15. Did the required number of samples get taken ? YES NO
16. Has permit expired ? YES NO
17. Was Certification statement signed and dated ? YES NO
18. Did User list or note any violations on form ? YES NO
19. Is any enforcement action required at this time ? _____ YES NO

DATE RECEIVED: 10-2-09

For Official use

INITIALED BY: RE

For Official use

CITY OF ROCK SPRINGS SELF SAMPLING REPORTING FORM

NAME OF FACILITY REPORTING: HALLIBURTON ENERGY SERVICES

DATE OF REPORT: 9 8 2009
MONTH DAY YEAR

PERIOD BEING REPORTED (MONTH, QUARTER, ETC...) Quarterly

REPORTING PERIOD: FROM 7-1-09 TO 9-30-09

1. WASH BAY EFFLUENT FLOW AMOUNT FOR THE PERIOD REPORTING: 497722 GPD GAL

2. WATER METER READINGS FOR THE PERIOD REPORTING: 209209 GPD GAL

3. PEAK WATER USE FOR THE PERIOD REPORTING: 17892.74 GPD GAL

4. WASH BAY WATER METER READINGS AT TIME OF SAMPLING: START: 224955 END: 225423

5. SHOW ALL TEST RESULTS ON THE NEXT PAGE AND INCLUDE THE SAMPLE DATES, TIMES AND SHOW THE SAMPLE CONTROL NUMBERS.

6. SHOW AND ATTACH ALL ADDITIONAL ANALYSIS RESULTS TAKEN BUT NOT REQUIRED.

7. INDICATE THE NUMBER OF TIMES YOUR FACILITY SAMPLED THEIR DISCHARGE THIS PERIOD: 1

8. INDICATE THE NUMBER DAYS YOUR FACILITY WAS IN OPERATION THIS PERIOD: 92

9. NAME OF LABORATORY PREPARING ANALYSIS: Energy Laboratories

10. ADDRESS OF LABORATORY: 2353 Salt Creek Highway
Casper, WY 82601

11. PHONE # OF LABORATORY: 307-235-0515 FAX # OF LABORATORY: 307-234-1693

12. PERMIT NUMBER: 03-07-043 EXPIRATION DATE: 6-12-2011

13. EPA TEST METHODS MUST BE USED AND SO INDICATED ON COMPLETED ANALYSIS SHEET.

14. PROVIDE A COPY OF LAB CERTIFICATION DOCUMENT AND INCLUDE WITH EACH REPORT.

15. FILL IN BLANK SPACES PROVIDED FOR THOSE PARAMETERS LISTED (SEE PERMIT TEST REQUIREMENTS)

		Sample Date	8-20-09				
		Sample Time	1300				
		Sample #	NW Marble				
Parameter Name	ABRV.	Local Limit	Analysis Results				
pH Test Results	Ph	5.0 or above					
Biological Oxygen Demand	BOD	5956 mg/l					
Total Suspended Solids	TSS	7603 mg/l	87				
Chloride	Chloride	5281 mg/l					
Arsenic	As	0.27 mg/l					
Beryllium	Be	0.043 mg/l					
Cadmium	Cd	<0.005 mg/l	0.0037				
Chromium Total	Cr (TOT)	5.0 mg/l					
Chromium Hex/VI	Cr VI	0.05 mg/l	ND				
Copper	Cu	1.06 mg/l	0.13				
Lead	Pb	1.81 mg/l	ND				
Mercury	Hg	<0.0005 mg/l					
Molybdenum	Mo	0.245 mg/l	0.10				
Nickel	Ni	2.92 mg/l	ND				
Silver	Ag	0.87 mg/l					
Selenium	Se	0.18 mg/l	ND				
Zinc	Zn	7.18 mg/l	0.11				
BETX (Total all 4)	BETX	750 ug/L	ND				
B/E/T/X (any single one)	B/E/T/X	50 ug/	ND				
Benzene	Benzene	50 ug/L	ND				
Total Petroleum Hydrocarbons	TPH	100.0 mg/l	13.0				
Diesel Range Organics	DRO	100.00 mg/l					

16. WAS YOUR FACILITY IN COMPLIANCE FOR THE PERIOD YOU ARE REPORTING: yes
17. IF YOUR FACILITY WAS OUT OF COMPLIANCE, SHOW THE NUMBER DAYS: N/A
18. INDICATE THE DATES YOUR FACILITY WAS OUT OF COMPLIANCE: N/A

19. IF YOUR FACILITY WAS OUT OF COMPLIANCE, EXPLAIN WHY: N/A
20. NAME OF PERSON WHO COLLECTED SAMPLE: Yvonne Freydenberg / Joe Kight
21. PROVIDE ONE (1) HOUR FLOW READING VALUE TAKEN AT TIME OF SAMPLING: 1072 gallons
22. NAME OF FACILITY MANAGER: Steve Reeves
23. COMMENTS OR EXPLANATIONS:

CERTIFICATION BY PERMITTEE

I CERTIFY, UNDER THE PENALTY OF PERJURY, THAT I HAVE PERSONALLY EXAMINED, AND AM FAMILIAR WITH, ALL OF THE INFORMATION IN THIS CRITICAL PARAMETER REPORT. BASED UPON MY INQUIRY OF THOSE PERSONS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION CONTAINED IN THIS REPORT, I BELIEVE THAT THE INFORMATION IS TRUE AND CORRECT REPRESENTATION OF THE TYPE OF DISCHARGE FROM THE STATED DISCHARGE POINT.

SIGNATURE OF RESPONSIBLE COMPANY OFFICIAL: Steve Reeves

PRINTED NAME OF RESPONSIBLE COMPANY OFFICIAL: Steve Reeves

TITLE OF PERSON CERTIFYING REPORT: Facility Manager

DATE SIGNED: 9-8-09

PLEASE SUBMIT THIS REPORT TO: SPECIAL PROJECTS AND PROGRAMS COORDINATOR
CITY OF ROCK SPRINGS, 212 D STREET, ROCK SPRINGS, WY 82901

NOTE: REPORT IS DUE BY TENTH DAY OF MONTH FOLLOWING THE PERIOD FOR WHICH YOU ARE REPORTING. (LATE REPORTS ARE A VIOLATION)

2009 FLOW DATA SHEET - HALLIBURTON - 1801 BLAIRTOWN ROAD, ROCK SPRINGS, WY

MONTH	WASH RACK DISCHARGE	
July	READING	USAGE GAL
1	944027.31	17892.74
2	953380.65	9353.34
3	962348.98	8968.33
4	968426.13	6077.15
5	972003.46	3577.33
6	976654.65	4651.19
7	980559.29	3904.64
8	985484.53	4925.24
9	989034.12	3549.59
10	996699.34	7665.22
11	1009241.14	12541.8
12	1020559.04	11317.9
13	1027441.32	6882.28
14	1035826.88	8385.56
15	1044395.31	8568.43
16	1047554.21	3158.9
17	1051635.36	4081.15
18	1058236.21	6600.85
19	1064310.37	6074.16
20	1079781.42	15471.05
21	1085327.67	5546.25
22	1088930.31	3602.64
23	1090308.10	1377.79
24	1092263.46	1955.36
25	1099541.28	7277.82
26	1103447.33	3906.05
27	1105680.65	2233.32
28	1110236.17	4555.52
29	1114043.26	3807.09
30	1123919.13	9875.87
31	1127119.42	3200.29
		200984.85
Total wash bay discharge		200984.85
Peak wash bay discharge		17892.74

2009 FLOW DATA SHEET - HALLIBURTON - 1801 BLAIRTOWN ROAD, ROCK SPRINGS, WY

MONTH	WASH RACK DISCHARGE	
AUG	READING	USAGE GAL
1	133629.42	6510
2	139331.13	5701.71
3	144726.84	5395.71
4	151469.59	6742.75
5	154333.98	2864.39
6	158426.67	4092.69
7	162361.88	3935.21
8	172198.7	9836.82
9	179934.02	7735.32
10	185618.16	5684.14
11	188352.34	2734.18
12	190445.92	2093.58
13	195374.31	4928.39
14	198422.12	3047.81
15	203616.49	5194.37
16	207661.21	4044.72
17	211369.76	3708.55
18	217460.12	6090.36
19	222144.65	4684.53
20	228615.11	6470.46
21	232270.3	3655.19
22	234616.12	2345.82
23	238496.13	3880.01
24	242742.92	4246.79
25	244450.27	1707.35
26	249155.64	4705.37
27	254315.49	5159.85
28	257140.34	2824.85
29	261426.12	4285.78
30	264544.96	3118.84
31	268822.72	4277.76
Month Total		141703.3
Total wash bay discharge		141703.3
Peak wash bay discharge		9836.82

2009 FLOW DATA SHEET - HALLIBURTON - 1801 BLAIRTOWN ROAD, ROCK SPRINGS, WY

MONTH	WASH RACK DISCHARGE	
Sept	READING	USAGE GAL
1	272242.71	3419.99
2	276419.57	4176.86
3	281527.49	5107.92
4	286174.16	4646.67
5	292326.24	6152.08
6	294617.66	2291.42
7	298112.34	3494.68
8	301556.91	3444.57
9	308040.67	6483.76
10	312299.73	4259.06
11	317644.51	5344.78
12	323746.47	6101.96
13	326817.13	3070.66
14	329278.63	2461.5
15	340843.06	11564.43
16	353122.59	12279.53
17	361130.83	8008.24
18	366372.67	5241.84
19	371419.13	5046.46
20	377836.78	6417.65
21	382943.47	5106.69
22	386446.77	3503.3
23	391398.12	4951.35
24	395864.19	4466.07
25	398882.51	3018.32
26	402616.47	3733.96
27	408599.31	5982.84
28	413231.01	4631.7
29	416326.90	3095.89
30	423856.9	7530
Month Total		155034.18
Total wash bay discharge		155034.18
Peak wash bay discharge		12279.53

THIS FORM IS TO DOCUMENT AND CERTIFY THAT
METHODS APPROVED UNDER 40 CFR PART 136 WERE
USED FOR WASTEWATER ANALYSES

" I certify that these analyses, MDL's, methods, procedures and resulting report (s) were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly analyze all samples and accurately report the results. I further certify that all analyses were performed in accordance with methods approved for wastewater under the latest revision to 40 CFR Part 136. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for analyzing the wastewater samples and generating the report (s), the analyses, report, and information submitted is, to the best of my knowledge and belief, true, accurate, and complete. "

Stephanie Waldrop
Signature

Reporting Supervisor
Title

8/31/09
Date

Name of Laboratory: Energy Laboratories

Address of Laboratory: 2393 Salt Creek Highway, Casper, WY 82601

This Certification Signed by (Type Name): Stephanie Waldrop



ANALYTICAL SUMMARY REPORT

August 31, 2009

Halliburton Energy Services Rock Springs
1801 Blairtown Road
Rock Springs, WY 82901

Workorder No.: C09080804 Quote ID: C2455 - Permit 03-07-043

Project Name: Rock Springs Municipal

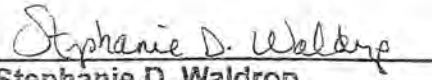
Energy Laboratories, Inc. received the following 2 samples for Halliburton Energy Services Rock Springs on 8/21/2009 for analysis.

Sample ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
C09080804-001	N.W. Manhole	08/20/09 13:00	08/21/09	Aqueous	Metals by ICP/ICPMS, Total Chromium, Hexavalent 1664 Prep Code E1664A Total Petroleum Hydrocarbons Metals Preparation by EPA 200.2 Solids, Total Suspended E624 Purgeable Organics, BTEX
C09080804-002	Trip Blank	08/20/09 13:00	08/21/09	Aqueous	E624 Purgeable Organics, BTEX

As appropriate, any exceptions or problems with the analyses are noted in the Laboratory Analytical Report, the QA/QC Summary Report, or the Case Narrative.

If you have any questions regarding these tests results, please call.

Report Approved By:


Stephanie D. Waldrop
Reporting Supervisor



LABORATORY ANALYTICAL REPORT

Client: Halliburton Energy Services Rock Springs
Project: Rock Springs Municipal
Lab ID: C09080804-001
Client Sample ID: N.W. Manhole

Report Date: 08/31/09
Collection Date: 08/20/09 13:00
Date Received: 08/21/09
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
PHYSICAL PROPERTIES							
Solids, Total Suspended TSS @ 105 C	87	mg/L		4		A2540 D	08/24/09 12:43 / dd
METALS - DISSOLVED							
Chromium, Hexavalent	ND	mg/L		0.01		A3500 Cr-B	08/21/09 12:16 / jal
METALS - TOTAL							
Cadmium	0.0037	mg/L		0.0005		E200.8	08/25/09 13:20 / sml
Copper	0.13	mg/L		0.01		E200.8	08/25/09 13:20 / sml
Lead	ND	mg/L		0.05		E200.8	08/25/09 13:20 / sml
Molybdenum	0.1	mg/L		0.1		E200.8	08/25/09 13:20 / sml
Nickel	ND	mg/L		0.05		E200.8	08/25/09 13:20 / sml
Selenium	ND	mg/L		0.001		E200.8	08/25/09 13:20 / sml
Zinc	0.11	mg/L		0.01		E200.8	08/25/09 13:20 / sml
VOLATILE ORGANIC COMPOUNDS							
Benzene	ND	ug/L		2.0		E624	08/27/09 13:19 / jlr
Ethylbenzene	ND	ug/L		2.0		E624	08/27/09 13:19 / jlr
m+p-Xylenes	ND	ug/L		2.0		E624	08/27/09 13:19 / jlr
o-Xylene	ND	ug/L		2.0		E624	08/27/09 13:19 / jlr
Toluene	ND	ug/L		2.0		E624	08/27/09 13:19 / jlr
Xylenes, Total	ND	ug/L		2.0		E624	08/27/09 13:19 / jlr
Surr: 1,2-Dichlorobenzene-d4	108	%REC		80-120		E624	08/27/09 13:19 / jlr
Surr: Dibromofluoromethane	99.0	%REC		80-120		E624	08/27/09 13:19 / jlr
Surr: p-Bromofluorobenzene	95.0	%REC		80-120		E624	08/27/09 13:19 / jlr
Surr: Toluene-d8	98.0	%REC		80-120		E624	08/27/09 13:19 / jlr
ORGANIC CHARACTERISTICS							
Non-polar Materials. (SGT-HEM)	13	mg/L		5.0		E1664A	08/25/09 08:57 / bah

Report
Definitions: RL - Analyte reporting limit.
QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



ENERGY LABORATORIES, INC. • 2393 Salt Creek Highway (82601) • P.O. Box 3258 • Casper, WY 82602
Toll Free 888.235.0515 • 307.235.0515 • Fax 307.234.1639 • casper@energylab.com • www.energylab.com

LABORATORY ANALYTICAL REPORT

Client: Halliburton Energy Services Rock Springs
Project: Rock Springs Municipal
Lab ID: C09080804-002
Client Sample ID: Trip Blank

Report Date: 08/31/09
Collection Date: 08/20/09 13:00
Date Received: 08/21/09
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
VOLATILE ORGANIC COMPOUNDS							
Benzene	ND	ug/L		1.0		E624	08/25/09 23:16 / jlr
Ethylbenzene	ND	ug/L		1.0		E624	08/25/09 23:16 / jlr
m+p-Xylenes	ND	ug/L		1.0		E624	08/25/09 23:16 / jlr
o-Xylene	ND	ug/L		1.0		E624	08/25/09 23:16 / jlr
Toluene	ND	ug/L		1.0		E624	08/25/09 23:16 / jlr
Xylenes, Total	ND	ug/L		1.0		E624	08/25/09 23:16 / jlr
Surr: 1,2-Dichlorobenzene-d4	108	%REC		80-120		E624	08/25/09 23:16 / jlr
Surr: Dibromofluoromethane	109	%REC		80-120		E624	08/25/09 23:16 / jlr
Surr: p-Bromofluorobenzene	95.0	%REC		80-120		E624	08/25/09 23:16 / jlr
Surr: Toluene-d8	96.0	%REC		80-120		E624	08/25/09 23:16 / jlr

Report
Definitions: RL - Analyte reporting limit.
QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



QA/QC Summary Report

Client: Halliburton Energy Services Rock Springs

Report Date: 08/31/09

Project: Rock Springs Municipal

Work Order: C09080804

Analyte	Count	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: A2540 D								Batch: 090824A-SLDS-TSS-W		
Sample ID: MBLK1_090824A	Method Blank					Run: BAL-1_090824A		08/24/09 12:40		
Solids, Total Suspended TSS @ 105 C		ND	mg/L	0.7						
Sample ID: LCS1_090824A	Laboratory Control Sample					Run: BAL-1_090824A		08/24/09 12:40		
Solids, Total Suspended TSS @ 105 C		192	mg/L	4.0	96	60	110			
Sample ID: C09080770-001BDUP	Sample Duplicate					Run: BAL-1_090824A		08/24/09 12:41		
Solids, Total Suspended TSS @ 105 C		1.000	mg/L	4.0				25		
Method: A3500 Cr-B								Batch: A2009-08-21_6_CR_01		
Sample ID: MBLK-1	Method Blank					Run: HACH DR3000_090821A		08/21/09 12:15		
Chromium, Hexavalent		0.004	mg/L	0.003						
Sample ID: LCS-2	Laboratory Control Sample					Run: HACH DR3000_090821A		08/21/09 12:16		
Chromium, Hexavalent		0.0971	mg/L	0.010	93	90	110			
Sample ID: C09080804-001AMS	Sample Matrix Spike					Run: HACH DR3000_090821A		08/21/09 12:16		
Chromium, Hexavalent		0.0971	mg/L	0.010	94	80	120			
Sample ID: C09080804-001AMSD	Sample Matrix Spike Duplicate					Run: HACH DR3000_090821A		08/21/09 12:16		
Chromium, Hexavalent		0.0971	mg/L	0.010	94	80	120	0	20	
Method: E1664A								Batch: 23513		
Sample ID: C09080804-001CMS	Sample Matrix Spike					Run: SPE1-C_090825A		08/25/09 08:57		
Non-polar Materials (SGT-HEM)		17	mg/L	5.1	<u>17</u>	64	132			S
- Spike exceeds acceptance limit. LCS is acceptable.										
Sample ID: C09080804-001CMSD	Sample Matrix Spike Duplicate					Run: SPE1-C_090825A		08/25/09 08:57		
Non-polar Materials (SGT-HEM)		16	mg/L	5.0	<u>12</u>	64	132	5.4	34	S
- Spike exceeds acceptance limit. LCS is acceptable.										
Sample ID: MBLK1_090825A	Method Blank					Run: SPE1-C_090825A		08/25/09 08:57		
Non-polar Materials (SGT-HEM)		ND	mg/L	5.0						
Sample ID: LCS1_090825A	Laboratory Control Sample					Run: SPE1-C_090825A		08/25/09 08:57		
Non-polar Materials (SGT-HEM)		16	mg/L	5.0	82	64	132			
Sample ID: LCSD_090825A	Laboratory Control Sample Duplicate					Run: SPE1-C_090825A		08/25/09 08:57		
Non-polar Materials (SGT-HEM)		17	mg/L	5.0	83	64	132	1.2	34	

Qualifiers:

RL - Analyte reporting limit.

ND - Not detected at the reporting limit

S - Spike recovery outside of advisory limits.



QA/QC Summary Report

Client: Halliburton Energy Services Rock Springs

Report Date: 08/28/09

Project: Rock Springs Municipal

Work Order: C09080804

Analyte	Count	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: E200.8										Batch: 23507
Sample ID: MB-23507	7	Method Blank					Run: ICPMS4-C_090825A			08/25/09 12:20
Cadmium		ND	mg/L	5E-05						
Copper		0.0002	mg/L	0.0001						
Lead		ND	mg/L	9E-05						
Molybdenum		ND	mg/L	0.0001						
Nickel		0.0001	mg/L	6E-05						
Selenium		8E-05	mg/L	7E-05						
Zinc		0.003	mg/L	0.0009						
Sample ID: LCS3-23507	7	Laboratory Control Sample					Run: ICPMS4-C_090825A			08/25/09 12:25
Cadmium		0.287	mg/L	0.010	115	85	115			
Copper		0.530	mg/L	0.010	106	85	115			
Lead		0.540	mg/L	0.050	108	85	115			
Molybdenum		0.545	mg/L	0.10	109	85	115			
Nickel		0.501	mg/L	0.050	100	85	115			
Selenium		0.531	mg/L	0.0010	106	85	115			
Zinc		0.528	mg/L	0.010	105	85	115			
Sample ID: C09080804-001BMS3	7	Sample Matrix Spike					Run: ICPMS4-C_090825A			08/25/09 13:25
Cadmium		0.266	mg/L	0.010	105	70	130			
Copper		0.615	mg/L	0.010	97	70	130			
Lead		0.535	mg/L	0.050	105	70	130			
Molybdenum		0.685	mg/L	0.10	108	70	130			
Nickel		0.469	mg/L	0.050	92	70	130			
Selenium		0.480	mg/L	0.0010	96	70	130			
Zinc		0.588	mg/L	0.010	95	70	130			
Sample ID: C09080804-001BMSD	7	Sample Matrix Spike Duplicate					Run: ICPMS4-C_090825A			08/25/09 13:30
Cadmium		0.283	mg/L	0.010	112	70	130	6.3	20	
Copper		0.626	mg/L	0.010	99	70	130	1.7	20	
Lead		0.554	mg/L	0.050	108	70	130	3.6	20	
Molybdenum		0.692	mg/L	0.10	110	70	130	1.1	20	
Nickel		0.480	mg/L	0.050	94	70	130	2.3	20	
Selenium		0.499	mg/L	0.0010	100	70	130	3.9	20	
Zinc		0.602	mg/L	0.010	98	70	130	2.4	20	

Qualifiers:

RL - Analyte reporting limit.

ND - Not detected at the reporting limit.



QA/QC Summary Report

Client: Halliburton Energy Services Rock Springs

Report Date: 08/31/09

Project: Rock Springs Municipal

Work Order: C09080804

Analyte	Count	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: E624										Batch: R123022
Sample ID: 27-Aug-09_LCS_3	10	Laboratory Control Sample				Run: 5975VOC1_090827B				08/27/09 10:55
Benzene		12	ug/L	1.0	120	70	130			
Ethylbenzene		11	ug/L	1.0	105	70	130			
m+p-Xylenes		21	ug/L	1.0	104	70	130			
o-Xylene		11	ug/L	1.0	108	70	130			
Toluene		11	ug/L	1.0	110	70	130			
Xylenes, Total		32	ug/L	1.0	105	70	130			
Surr: 1,2-Dichlorobenzene-d4				1.0	97	80	120			
Surr: Dibromofluoromethane				1.0	104	80	120			
Surr: p-Bromofluorobenzene				1.0	102	80	120			
Surr: Toluene-d8				1.0	100	80	120			
Sample ID: 27-Aug-09_MBLK_6	10	Method Blank				Run: 5975VOC1_090827B				08/27/09 12:43
Benzene		ND	ug/L	1.0						
Ethylbenzene		ND	ug/L	1.0						
m+p-Xylenes		ND	ug/L	1.0						
o-Xylene		ND	ug/L	1.0						
Toluene		ND	ug/L	1.0						
Xylenes, Total		ND	ug/L	1.0						
Surr: 1,2-Dichlorobenzene-d4				1.0	108	80	120			
Surr: Dibromofluoromethane				1.0	99	80	120			
Surr: p-Bromofluorobenzene				1.0	95	80	120			
Surr: Toluene-d8				1.0	96	80	120			
Sample ID: C09080808-001CMS	10	Sample Matrix Spike				Run: 5975VOC1_090827B				08/27/09 18:41
Benzene		240	ug/L	20	120	70	130			
Ethylbenzene		220	ug/L	20	108	70	130			
m+p-Xylenes		420	ug/L	20	105	70	130			
o-Xylene		220	ug/L	20	109	70	130			
Toluene		220	ug/L	20	112	70	130			
Xylenes, Total		640	ug/L	20	106	70	130			
Surr: 1,2-Dichlorobenzene-d4				20	98	80	120			
Surr: Dibromofluoromethane				20	98	80	120			
Surr: p-Bromofluorobenzene				20	101	80	120			
Surr: Toluene-d8				20	100	80	120			
Sample ID: C09080808-001CMSD	10	Sample Matrix Spike Duplicate				Run: 5975VOC1_090827B				08/27/09 19:52
Benzene		240	ug/L	20	120	70	130	0	20	
Ethylbenzene		210	ug/L	20	104	70	130	4.2	20	
m+p-Xylenes		410	ug/L	20	103	70	130	1.5	20	
o-Xylene		210	ug/L	20	107	70	130	1.9	20	
Toluene		220	ug/L	20	108	70	130	2.9	20	
Xylenes, Total		630	ug/L	20	104	70	130	1.6	20	
Surr: 1,2-Dichlorobenzene-d4				20	98	80	120	0	10	
Surr: Dibromofluoromethane				20	106	80	120	0	10	

Qualifiers:

RL - Analyte reporting limit.

ND - Not detected at the reporting limit.



QA/QC Summary Report

Client: Halliburton Energy Services Rock Springs

Report Date: 08/31/09

Project: Rock Springs Municipal

Work Order: C09080804

Analyte	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: E624									Batch: R123022
Sample ID: C09080808-001CMSD	Sample Matrix Spike Duplicate				Run: 5975VOC1_090827B				08/27/09 19:52
Surr: p-Bromofluorobenzene			20	102	80	120	0	10	
Surr: Toluene-d8			20	101	80	120	0	10	
Method: E624									Batch: R123024
Sample ID: 25-Aug-09_LCS_4	Laboratory Control Sample				Run: 5975VOC1_090825C				08/25/09 13:38
Benzene	11	ug/L	1.0	114	70	130			
Ethylbenzene	10	ug/L	1.0	101	70	130			
m+p-Xylenes	20	ug/L	1.0	101	70	130			
o-Xylene	10	ug/L	1.0	104	70	130			
Toluene	11	ug/L	1.0	106	70	130			
Xylenes, Total	31	ug/L	1.0	102	70	130			
Surr: 1,2-Dichlorobenzene-d4			1.0	97	80	120			
Surr: Dibromofluoromethane			1.0	106	80	120			
Surr: p-Bromofluorobenzene			1.0	103	80	120			
Surr: Toluene-d8			1.0	101	80	120			
- No MS/SMD pair reported due to several analytes being out of calibration range. Due to limited sample availability, no reanalysis can be performed.									
Sample ID: 25-Aug-09_MBLK_7	Method Blank				Run: 5975VOC1_090825C				08/25/09 15:25
Benzene	ND	ug/L	1.0						
Ethylbenzene	ND	ug/L	1.0						
m+p-Xylenes	ND	ug/L	1.0						
o-Xylene	ND	ug/L	1.0						
Toluene	ND	ug/L	1.0						
Xylenes, Total	ND	ug/L	1.0						
Surr: 1,2-Dichlorobenzene-d4			1.0	106	80	120			
Surr: Dibromofluoromethane			1.0	101	80	120			
Surr: p-Bromofluorobenzene			1.0	94	80	120			
Surr: Toluene-d8			1.0	94	80	120			

Qualifiers:

RL - Analyte reporting limit.

ND - Not detected at the reporting limit.



Chain of Custody and Analytical Request Record

Page ____ of ____

PLEASE PRINT- Provide as much information as possible.

Company Name: <i>Health Benton</i>	Project Name, PWS, Permit, Etc. <i>Rock Springs Municipal</i>	Sample Origin State:	EPA/State Compliance: Yes <input type="checkbox"/> No <input type="checkbox"/>
Report Mail Address: <i>1801 Blairtown Rd Rock Springs, WY 82901</i>	Contact Name: <i>Steve Reeves</i>	Phone/Fax: <i>307-352-0253 Fax</i>	Email: <i>Steve.Reeves@hullbenton.com</i>
Invoice Address:	Invoice Contact & Phone:	Purchase Order:	Sampler: (Please Print) <i>Yvonne Freydenberg</i> <i>302 Kight</i>
			Quote/Bottle Order: <i>27126</i>

Special Report/Formats – ELI must be notified prior to sample submittal for the following:

- | | |
|---------------------------------------|--|
| <input type="checkbox"/> DW | <input type="checkbox"/> A2LA |
| <input type="checkbox"/> GSA | <input type="checkbox"/> EDD/EDT (Electronic Data) |
| <input type="checkbox"/> POTW/WWTP | Format: _____ |
| <input type="checkbox"/> State: _____ | <input type="checkbox"/> LEVEL IV |
| <input type="checkbox"/> Other: _____ | <input type="checkbox"/> NELAC |

Number of Containers
Sample Type: A W S V B O
Air Water Soils/Solids
Vegetation Bioassay Other

ANALYSIS REQUESTED

SEE ATTACHED

Normal Turnaround (TAT)

R
U
S
H

Contact ELI prior to RUSH sample submittal for charges and scheduling – See Instruction Page

Comments:

Shipped by:

Fed ex
Cooler ID(s):*C1621*Receipt Temp
13 °COn Ice: *melted*
Yes ☒ No ☐Custody Seal ☒ Y ☐ NBottles/ Coolers ☒ B ☒ CIntact ☒ Y ☐ NSignature Match ☒ Y ☐ N

LABORATORY USE ONLY

SAMPLE IDENTIFICATION (Name, Location, Interval, etc.)	Collection Date	Collection Time	MATRIX																	
<i>h.w. Man hole</i>	<i>8-20-09</i>	<i>0700</i> <i>1300</i>	<i>h-w</i>																	
<i>2 Trip Blank</i>																				
<i>3 for Unknown</i>																				
<i>4 for</i>																				
<i>5</i>																				
<i>6</i>																				
<i>7</i>																				
<i>8</i>																				
<i>9</i>																				
<i>10</i>																				

Custody Record MUST be Signed	Relinquished by (print): <i>Steve Reeves</i>	Date/Time: <i>8-20-09</i>	Signature: <i>Steve Reeves</i>	Received by (print):	Date/Time:	Signature:
	Relinquished by (print):	Date/Time:	Signature:	Received by (print):	Date/Time:	Signature:
	Sample Disposal:	Return to Client:	Lab Disposal:	Received by Laboratory:	Date/Time:	Signature:
				<i>Andrea</i>	<i>8/21/09 10:15</i>	<i>[Signature]</i>

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested.

This serves as notice of this possibility. All sub-contract data will be clearly notated on your analytical report.

Visit our web site at www.energylab.com for additional information, downloadable fee schedule, forms, and links.



ENERGY LABORATORIES, INC. * 2393 Salt Creek Hwy (82601) * PO Box 3258 * Casper, WY 82602
Toll Free 888.235.0515 * 307.235.0515 * FAX 307.234.1639 * casper@energylab.com * www.energylab.com

BOTTLE ORDER 27126



SHIPPED TO: Halliburton Energy Services

Contact:

1801 Blairtown Road
Rock Springs WY 82901

Order Created by: Tessa Parke

Quote Used: 2455

Ship Date: 6/2/2009

Phone:

VIA: Ground

Bottle Type Required	Test(s)	Per Samp	Samp Qty
1 Liter Clear Glass, Narrow Mouth, H ₂ SO ₄ (Yellow) to pH <2	E1664A Total Petroleum Hydrocarbons (E1664A)	3	2
40 mL Clear Glass VOA Vial, HCl (Blue) to pH <2	E624 Purgeable Organics, BTEX (E624)	3	2
500 mL Plastic, Non-filtered, HNO ₃ (Red) to pH <2	Metals by ICP/ICPMS, Total (E200.7_8)	1	2
500 mL Plastic, Non-filtered, Unpreserved	Chromium, Hexavalent (A3500 Cr-B)	1	2
	Solids, Total Suspended (A2540 D)		
40 mL Clear Glass VOA Vial, HCl (Blue) to pH <2	Trip Blank ()	1	2

Comments:

Please send it two separate coolers.

The following is a list of preservatives. The color-coded vial caps correspond to the color-coded sample container or label.

Nitric (HNO₃) Acid = Red-capped Vial

Phosphoric (H₃PO₄) Acid = White-capped Vial

Sodium Hydroxide (NaOH) = Green-capped Vial

Fill 40 ml VOA vials completely full with no headspace.

Sulfuric (H₂SO₄) Acid = Yellow-capped Vial

Zinc Acetate (ZnOAc) = Purple-capped Vial

Hydrochloric (HCl) Acid = Blue-capped Vial

Material Safety Data Sheets(MSDS) Available @ EnergyLab.com ->Services -> MSDS Sheets

Corrosive Chemicals: Nitric, Sulfuric, Phosphoric, Hydrochloric Acids and Sodium Hydroxide. Zinc Acetate is a skin irritant.

Subcontracting of sample analyses to an outside laboratory may be required. If so, Energy Laboratories will utilize its branch laboratories or qualified contract laboratories for this service. Any such laboratories will be indicated within the Laboratory Analytical Report.

Energy Laboratories Inc

Workorder Receipt Checklist



C09080804

Login completed by: Edith McPike

Date and Time Received: 8/21/2009 10:15 AM

Reviewed by:

Received by: al

Reviewed Date:

Carrier name: FedEx

Shipping container/cooler in good condition?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Not Present <input type="checkbox"/>
Custody seals intact on shipping container/cooler?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Not Present <input type="checkbox"/>
Custody seals intact on sample bottles?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Not Present <input checked="" type="checkbox"/>
Chain of custody present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Chain of custody signed when relinquished and received?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Chain of custody agrees with sample labels?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Samples in proper container/bottle?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sample containers intact?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sufficient sample volume for indicated test?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
All samples received within holding time?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Container/Temp Blank temperature:	13°C On Ice		
Water - VOA vials have zero headspace?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No VOA vials submitted <input type="checkbox"/>
Water - pH acceptable upon receipt?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Not Applicable <input type="checkbox"/>

Contact and Corrective Action Comments:

None



CLIENT: Halliburton Energy Services Rock Springs
Project: Rock Springs Municipal
Sample Delivery Group: C09080804

Date: 31-Aug-09

CASE NARRATIVE

ORIGINAL SAMPLE SUBMITTAL(S)

All original sample submittals have been returned with the data package.

SAMPLE TEMPERATURE COMPLIANCE: 4°C (±2°C)

Temperature of samples received may not be considered properly preserved by accepted standards. Samples that are hand delivered immediately after collection shall be considered acceptable if there is evidence that the chilling process has begun.

GROSS ALPHA ANALYSIS

Method 900.0 for gross alpha and gross beta is intended as a drinking water method for low TDS waters. Data provided by this method for non potable waters should be viewed as inconsistent.

RADON IN AIR ANALYSIS

The desired exposure time is 48 hours (2 days). The time delay in returning the canister to the laboratory for processing should be as short as possible to avoid excessive decay. Maximum recommended delay between end of exposure to beginning of counting should not exceed 8 days.

SOIL/SOLID SAMPLES

All samples reported on an as received basis unless otherwise indicated.

ATRAZINE, SIMAZINE AND PCB ANALYSIS

Data for PCBs, Atrazine and Simazine are reported from EPA 525.2. PCB data reported by ELI reflects the results for seven individual Aroclors. When the results for all seven are ND (not detected), the sample meets EPA compliance criteria for PCB monitoring.

SUBCONTRACTING ANALYSIS

Subcontracting of sample analyses to an outside laboratory may be required. If so, ENERGY LABORATORIES will utilize its branch laboratories or qualified contract laboratories for this service. Any such laboratories will be indicated within the Laboratory Analytical Report.

BRANCH LABORATORY LOCATIONS

eli-b - Energy Laboratories, Inc. - Billings, MT
eli-g - Energy Laboratories, Inc. - Gillette, WY
eli-h - Energy Laboratories, Inc. - Helena, MT
eli-r - Energy Laboratories, Inc. - Rapid City, SD
eli-t - Energy Laboratories, Inc. - College Station, TX

CERTIFICATIONS:

USEPA: WY00002, Radiochemical WY00937; FL-DOH NELAC: E87641, Radiochemical E871017; California: 02118CA; Oregon: WY200001; Utah: 3072350515; Virginia: 00057; Washington: C1903

ISO 17025 DISCLAIMER:

The results of this Analytical Report relate only to the items submitted for analysis.

ENERGY LABORATORIES, INC. - CASPER, WY certifies that certain method selections contained in this report meet requirements as set forth by the above accrediting authorities. Some results requested by the client may not be covered under these certifications. All analysis data to be submitted for regulatory enforcement should be certified in the sample state of origin. Please verify ELI's certification coverage by visiting www.energylab.com

ELI appreciates the opportunity to provide you with this analytical service. For additional information and services visit our web page www.energylab.com.

THIS IS THE FINAL PAGE OF THE LABORATORY ANALYTICAL REPORT

Rock Springs Municipal Utility
212 D Street
Rock Springs, WY 82901
307-352-1527

DUE DATE

7/21/09

HALLIBURTON ENERGY SERVICES
HALLIBURTON ENERGY SERVICES
1801 BLAIRTOWN RD
ROCK SPRINGS WY 82901

1801 BLAIRTOWN RD

16000-15574	04-01	7/01/09	7/21/09	Last Bill Amount	5,061.26
				Payments	5,061.26-
				Adjustments	.00
				Balance Forward	.00
Rate Class : COMMERCIAL					
Last payment amount/date:				5,061.26	6/15/09

Service	Period	Days	Meter Number	Mult	Units	Current	Previous	Usage	
WA	5/21/09	6/22/09	32	06385028	1.000	CF1	1011000	929360	81640
WA	5/21/09	6/22/09	32	06385028	1.000	CF2	40790	37330	3460

Service	Consumption	Charge	Total
WA WATER	85,100.00	2,146.27	2,146.27
SW SEWER	84,490.00	3,430.29	3,430.29

Total Current Charges	5,576.56
Balance Forward	.00
Total Amount Due	5,576.56

Any balance forward is due immediately.
Any account subject to delivery of a
delinquent notice shall be charged a
\$15.00 fee.

550520 1014261100

PLEASE DETACH HERE AND RETURN THIS PORTION WITH PAYMENT

HALLIBURTON ENERGY SERVICES
HALLIBURTON ENERGY SERVICES
1801 BLAIRTOWN RD
ROCK SPRINGS WY 82901

DUE DATE

7/21/09

1801 BLAIRTOWN RD

AMOUNT PAID

16000-15574	04-01	7/01/09	7/21/09
Total Current Charges			5,576.56
Balance Forward			.00
Total Amount Due			5,576.56

(If Different)

Rock Springs Municipal Utility
212 D Street
Rock Springs, WY 82901
307-352-1527

DUE DATE

8/23/09

HALLIBURTON ENERGY SERVICES
HALLIBURTON ENERGY SERVICES
1801 BLAIRTOWN RD
ROCK SPRINGS WY 82901

1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 26

1801 BLAIRTOWN RD

16000-15574	04-01	8/01/09	8/23/09	Last Bill Amount	5,576.56
				Payments	5,576.56-
				Adjustments	.00
				Balance Forward	.00
Rate Class	: COMMERCIAL				
Last payment amount/date:		5,576.56	7/13/09		

	Service	Period	Days	Meter	Number	Mult	Units	Current	Previous	Usage
WA	6/22/09	7/23/09	31	06385028	1.000	CF1	1076770	1011000	65770	
WA	6/22/09	7/23/09	31	06385028	1.000	CF2	44210	40790	3420	

Service	Consumption	Charge	Total
WA WATER	20,087.42	516.46	
WA WATER	49,102.58	1,281.57	
TOTAL WATER			1,798.03
SW SEWER	84,490.00	3,430.29	3,430.29
	Total Current Charges		5,228.32
	Balance Forward		.00
	Total Amount Due		5,228.32

Any balance forward is due immediately.
Any account subject to delivery of a
delinquent notice shall be charged a
\$15.00 fee.

550520

014261100

PLEASE DETACH HERE AND RETURN THIS PORTION WITH PAYMENT

HALLIBURTON ENERGY SERVICES
HALLIBURTON ENERGY SERVICES
1801 BLAIRTOWN RD
ROCK SPRINGS WY 82901

DUE DATE

8/23/09

1801 BLAIRTOWN RD

16000-15574	04-01	8/01/09	8/23/09
Total Current Charges			5,228.32
Balance Forward			.00
Total Amount Due			5,228.32

AMOUNT PAID

(If Different)

Rock Springs Municipal Utility
212 D Street
Rock Springs, WY 82901
307-352-1527

DUE DATE

9/21/09

HALLIBURTON ENERGY SERVICES
HALLIBURTON ENERGY SERVICES
1801 BLAIRTOWN RD
ROCK SPRINGS WY 82901

1801 BLAIRTOWN RD

16000-15574	04-01	9/01/09	9/21/09	Last Bill Amount	5,228.32
				Payments	5,228.32-
				Adjustments	.00
Rate Class : COMMERCIAL				Balance Forward	.00
Last payment amount/date:		5,228.32	8/17/09		

	Service	Period	Days	Meter	Number	Mult	Units	Current	Previous	Usage
WA	7/23/09	8/20/09	28	06385028	1.000	CF1	1128280	1076770	51510	
WA	7/23/09	8/20/09	28	06385028	1.000	CF2	47690	44210	3480	

Service	Consumption	Charge	Total
WA WATER	54,990.00	1,473.00	1,473.00
SW SEWER	84,490.00	3,430.29	3,430.29

Total Current Charges	4,903.29
Balance Forward	.00
Total Amount Due	4,903.29

Any balance forward is due immediately.
Any account subject to delivery of a
delinquent notice shall be charged a
\$15.00 fee.

PLEASE DETACH HERE AND RETURN THIS PORTION WITH PAYMENT

SEP 2 1963

HALLIBURTON ENERGY SERVICES
HALLIBURTON ENERGY SERVICES
1801 BLAIRTOWN RD
ROCK SPRINGS WY 82901

DUE DATE

9/21/09

1801 BLAIRTOWN RD

AMOUNT PAID

16000-15574	04-01	9/01/09	9/21/09
Total Current Charges			4,903.29
Balance Forward			.00
Total Amount Due			4,903.29

(If Different)

HALLIBURTON COMPANY
FACILITY CLOSURE CHECKLIST

Prop. ID#

H4005

City/State

Rock Springs WY 82744

Operating Units, with the assistance of Real Estate Services, shall take the necessary actions to deactivate and close the facilities as follows:

Notify Real Estate Services (RES), (281) 575.4136, immediately upon determination of an impending close out. RES and Business Unit Managers will jointly develop and execute facilities closure plans. Return completed Checklist to Scott Jacobson.

1) Removal of all portable assets, i.e., all equipment (to include bulk tanks, acid tanks, fuel tanks, and other portable assets), window mounted air conditioning units, air compressors, spare parts, materials/supplies, inventories and furniture (including desks, chairs and file cabinets, etc.).

Comments:

Signature:

Steve Jacobson

Date:

6/24/09

2) Arrange for original copy of records to be inventoried and forwarded to Records Management for archive.

Comments:

Signature: _____

Date: _____

Prop. ID# 0
City/State 0

HALLIBURTON COMPANY FACILITY CLOSURE CHECKLIST

3) Removal of all oils, chemicals, radiation sources and other usable products and waste materials including:

- Cement, sand, acid, chemicals, gasoline and diesel fuel, etc. from all tanks. Coordinate disposal activities with Robert Sherman of Health, Safety & Environmental (HSE) at (281) 575-4420. (see Environmental Site Closure Checklist. The items on this list should be coordinated with HSE). Clean out tanks as needed before moving from site.
- Oil, paint and waste drums.
- Remove and clean sludge from all wash bays, pits, sumps, floor drains, oil/water separators, vaults, and chemical/fuel containment areas. Steam clean and neutralize areas as appropriate. Coordinate as appropriate with HSE.
- Remove all trash, scrap metal and rubbish.

Comments:

Need to Clean Sand up

Signature: *Stan Dean* Date: *6/24/09*

4) Install durable covers over all oil/grit pits and sumps. Ensure covers are properly secured.

Comments:

N/A

Signature: *Stan Dean* Date: *6/24/09*

5) Steam clean all shop bays, paint booths and parking areas (as appropriate/necessary)

Comments:

N/A

Signature: *Stan Dean* Date: *6/24/09*

Prop. ID# 0
City/State 0

HALLIBURTON COMPANY FACILITY CLOSURE CHECKLIST

6) Discontinue the use of telephone, data line and facsimile line services. Remove all telephones and telephone switch equipment from the site. Arrange for return of leased/rented office equipment,

Comments:

N/A

Signature: [Signature]

Date: 6/24/05

7) Clean and mop all office and shop warehouse buildings.

Comments:

N/A

Signature: [Signature]

Date: 6/24/05

8) Winterize facility as appropriate (Draining water lines, etc.).

Comments:

N/A

Signature: [Signature]

Date: 6/24/05

Prop. ID# 0
City/State 0

HALLIBURTON COMPANY FACILITY CLOSURE CHECKLIST

9) Secure facility - board up windows, secure (lock) all doors and gates.

Comments:

N/A

Signature: Steve Beavers

Date: 6/24/99

10) Provide security lighting, if necessary. Arrange to have all utilities disconnected, unless other arrangements have been made with RES.

Comments:

N/A

Signature: Steve Beavers

Date: 6/24/99

11) Arrange for mowing and weed control services; provide contractor names and telephone numbers to RES.

Comments:

N/A

Signature: Steve Beavers

Date: 6/24/99

Prop. ID# 0
City/State 0

HALLIBURTON COMPANY FACILITY CLOSURE CHECKLIST

12) Ensure all keys are sent to Real Estate or, in the case of a terminated lease, to the Landlord.

Comments:

N/A

Signature:

Steve Brown

Date:

6/24/09

13) Contact RES for final inspection of site. Turn all "issue for construction: and/or "as built" drawings and keys over to RES. (Mike Armor - 580/251-4276 will conduct inspection.)

Comments:

Signature: _____

Date: _____



Wastewater Treatment Plant [307] 352-1465
Building Inspections [307] 352-1541
Planning and Zoning [307] 352-1540
Vehicle Maintenance [307] 352-1452

Department of Public Services
212 D Street, Rock Springs, WY 82901
Office [307] 352-1540 • FAX [307] 352-1545

November 10, 2010

John Graves
Manager, Environmental Geologist
Terracon
1509 Elk Street
Rock Springs, WY 82901

CITY OF ROCK SPRINGS NOTICE OF VIOLATION

This NOTICE OF VIOLATION, (NOV), by **TERRACON, RS-3** of Rock Springs City Ordinance's Article 7-4, Section 7-403, Sub Section 8, 8-04 (g), Industrial Wastewater Permit, 8-04 (l), Sub Section 17, 17-01 (c)(i) Reporting Requirements for Permitted Dischargers Certifications Statements are required to be submitted by **TERRACON, RS-3** as part of the Self Monitoring Reports which was received 10-09-09 and 01-9-10.

This NOTICE OF VIOLATION, (NOV), is being issued to **TERRACON, RS-3** by the Special Projects and Programs Coordinator, of the City of Rock Springs pursuant to Rock Springs City Ordinance's Article 7-4, Section 7-403, Sub Section 27., 27-02 (f).

THE SPECIAL PROJECTS AND PROGRAMS COORDINATOR FINDS THAT:

1. To prevent water pollution, pass through and/or interference of treatment facilities or collection systems, and to abide by Federal and State Laws and Rock Springs City Ordinance's Article 7-4, Section 7-403, Sub Sections 1, 1-01, 1-02, 1-03, 1-04, 1-05, require the City of Rock Springs to administer and enforce an industrial pretreatment program.
2. These laws and Ordinances are designed to protect the Rock Springs City Wastewater Collection Systems, Wastewater Reclamation Facility and the public. Article 7-4, Section 7-403, Sub Section 3, 3-04, 3-06, 3-07; Sub Section 4, 4-01, 4-02.
3. Under these requirements, **TERRACON, RS-3** was issued a permit in which set discharge limits and special monitoring and reporting requirements were described and made mandatory. Article 7-4, Section 7-403, Sub Section 4, 4-03; Sub Section 7, 7-01, 7-02, 7-04, 7-03, 7-05, 7-07; Sub Section 8, 8-01, 8-02, 8-03, 8-04, 8-05.
4. A compliance review of your file for the past 6 quarters has shown these violations, reporting violations noticed:
 - a. October 9, 2009 violation noted on Self Monitoring Report requirements (SMR):
 - b. January 9, 2010 violation noted on Self Monitoring Report requirements (SMR):
 - c. That **TERRACON, RS-3** sampled, analyzed and then did not provide with the Self Monitoring Report received on 10-09-09 and 01-09-10, the required Lab Certification Statements.
5. That public health was not determined to be in immediate danger.
6. In that **TERRACON, RS-3** has failed to meet the required permit conditions as follows: Article 7-4 Section 7-403 Sub-Section 8, 8-04 (g), Sub-Section 17, 17-01 (c)(1).
7. In that **TERRACON, RS-3** **TERRACON, RS-3** did not provide the required Lab Certification Statements as listed above, **TERRACON, RS-3** has violated the City of Rock Springs Ordinance's Article 7-4, Section 7-403, and Sub Sections pertaining thereto as explained above, the Pretreatment Program and the Permit conditions and or requirements pertaining thereto as explained above.
8. In that **TERRACON, RS-3** received no notable economic benefit for this violation, the City of Rock Springs has determined economic benefit not to be a factor in these violations.
9. In that the City of Rock Springs does not at this time determine recalcitrance to be a factor in these violations.
10. That no un-controllable circumstances have initiated and contributed to cause this violation.

THEREFORE, BASED ON THE ABOVE FINDINGS, THE TERRACON, RS-19 IS HEREBY NOTIFIED THAT:

1. **TERRACON, RS-3**, shall provide written documentation of what they are doing to find the cause of missing Lab Certification Statements, and an estimation of why the violation occurred.
2. Failure to prevent future and or continued violations of the City of Rock Springs Ordinance's may result in escalation to more stringent enforcement action by Rock Springs City including but not limited to the imposition of administrative, civil and/or criminal fines and penalties.
3. This notification is in response to the violations contained herein, and is the City of Rock Springs response to these first time reporting violations.
4. You must provide the Lab Certification Statements that are missing by **November 24, 2010**.
5. Please respond in writing why these violations occurred and your intentions to prevent these violations from happening again. This is due by **November 24, 2010**.

We feel that you are doing an excellent job controlling the discharge at your facility. But even with the best of intentions problems do occur, we appreciate that you are consistently working to improve your system and operations.

You have been very good to work with, and I thank you for your co-operation. If you have any questions please call 307-352-1466.

Sincerely



Randy Conner
Special Projects and Programs Coordinator

cc: Vess Walker, Director of Public Services
Mike Gaviotis, WWTP Superintendent
File



Wastewater Treatment Plant [307] 352-1465
Building Inspections [307] 352-1541
Planning and Zoning [307] 352-1540
Vehicle Maintenance [307] 352-1452

Department of Public Services
212 D Street, Rock Springs, WY 82901
Office [307] 352-1540 • FAX [307] 352-1545

CITY OF ROCK SPRINGS NOTICE OF VIOLATION

September 22, 2010

Linda Simmons, Administrator
Darren Achall, Supervisor, Plant Operations
Memorial Hospital of Sweetwater County
P.O. Box 1359
1200 College Drive
Rock Springs, WY 82902

This **NOTICE OF VIOLATION** to **MEMORIAL HOSPITAL of SWEETWATER COUNTY** of Rock Springs City Ordinance's Article 7-4, Section 7-403, Sub-Sections and Parts listed herein is being issued by the Special Projects and Programs Coordinator, of the City of Rock Springs pursuant to all relevant sections, sub-sections, and Parts of the Rock Springs City Ordinance's pertaining thereto.

THE SPECIAL PROJECTS AND PROGRAMS COORDINATOR FINDS THAT:

1. To prevent water pollution, pass through and/or interference of treatment facilities and or collection systems, and to abide by Federal and State Laws and Rock Springs City Ordinance's Article 7-4, Section 7-403 Sub-Section 1, Parts 1-01, 1-02, 1-03, 1-04, 1-05, require the City of Rock Springs to administrate and enforce an Industrial Pretreatment Program.
2. As per definitions in Rock Springs City Ordinance's Article 7-4, Section 7-403, Sub-Section 2, Parts 2-01 through 2-48.
3. These laws and ordinances are designed to protect the Rock Springs City Wastewater Collection Systems, Wastewater Reclamation Facility, and the Public. Article 7-4. Section 7-403. Sub-Section 3. Parts 3-04, 3-07, Sub Section 4. Parts 4-01, 4-02, 4-03.

4. Under these requirements, **MEMORIAL HOSPITAL of SWEETWATER COUNTY** was issued a permit in response to a permit application to discharge, from **MEMORIAL HOSPITAL of SWEETWATER COUNTY**, from May 19, 2008 to May 19, 2010, to the City of Rock Springs in which set discharge limits and special monitoring and reporting requirements were described and made mandatory, as per City Ordinances, Article 7-4. Section 7-403. Sub-Section 3. Part 3-06, Sub-Section 4. Part 4-03. Sub-Section 6. Part 6-01, Sub-Section 7. Parts 7-01, 7-02, 7-03, 7-05, 7-07. Sub-Section 8, Parts 8-02, 8-03, 8-04, 8-05.
5. **MEMORIAL HOSPITAL of SWEETWATER COUNTY** was issued this Discharge Permit, Permit Number 09-98-14, which required Semi-Annually sampling and reporting under the requirements of the Industrial Pretreatment Program and City Ordinances. The period this Permit covered was from May 19, 2008 to May 19, 2010.
6. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** is currently in Violation at this time.
7. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** failed to sample during the required sampling period of July 1, 2009 to December 31, 2009 as required in their Permit.
8. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** failed to sample during the required sampling period of January 1, 2010 to June 30, 2010 as required in their Permit.
9. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** failed to report the results of the required sampling on or before the Reporting date of January 10, 2010 as required in their Permit.
10. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** failed to report the results of the required sampling on or before the Reporting date of July 10, 2010 as required in their Permit.
11. **MEMORIAL HOSPITAL of SWEETWATER COUNTY** has exceeded the Chloride Permit Limit of 5281 mg/l for the first quarter of 2009 by discharging 10,300 mg/l, which violated the Permitted discharge limit.
12. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** failed to provide 24 Notice of the Chloride Violation listed in # 10 above.
13. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** failed to provide written notice within five (5) days of the Chloride Violation listed in # 10 above.
14. **MEMORIAL HOSPITAL of SWEETWATER COUNTY** failed to re-apply for a new permit as required prior to the expiration date of May 19, 2010. This is a Violation of Permit and Ordinance requirements
15. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** failed to provide 24 notice of the Violations listed herein.
16. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** failed to provide written notice of the Violations listed herein within five (5) days of the events.
17. That at no time was public health determined to be in immediate danger due to the violations listed herein by **MEMORIAL HOSPITAL of SWEETWATER COUNTY** discharge.
18. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** did receive notable economic benefit by these violations by not complying with permit sampling and testing requirements, approximately \$768.00 + 10% est. S&H = \$844.00 + Manpower 3 hours at est. \$15.00 per hour = \$45.00. \$844.00 + \$45.00 = **\$889.00 Total Economic Benefit.**

19. That the City of Rock Springs does not believe that recalcitrance is a factor in these violations, but the negligence of **MEMORIAL HOSPITAL of SWEETWATER COUNTY** to provide continuity between administration, management and staff is the cause of these violations, and wholly preventable. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** did negligently violate the permit requirements;
20. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** did not try to resolve the violations prior to contact by the City.
21. That no un-controllable circumstances caused the violations. All actions taken by **MEMORIAL HOSPITAL of SWEETWATER COUNTY** did cause these violations.
22. That on time monitoring/sampling and reporting have been in violation in the past, and have now caused a second SNC Violations of this nature by **MEMORIAL HOSPITAL of SWEETWATER COUNTY** and is the main cause for this Notice of Violation hereby being issued to **MEMORIAL HOSPITAL of SWEETWATER COUNTY** as per Article 7-4. Section 7-403. Sub-Section 24. Part 24-01.
23. That **MEMORIAL HOSPITAL of SWEETWATER COUNTY** did violate the following City of Rock Springs Ordinance Article 7-4, Section 7-403, Sub-Section 24., and all other Sections, Sub-Sections, and Parts as listed below:

ITEM OR DESCRIPTION OF VIOLATIONS:		NUMBER OF VIOLATIONS	DAYS IN VIOLATION	TOTAL # OF VIOLATIONS
A.	Exceeded the Chloride Permit Limit Limit for the first quarter of 2009.	1	X 90	= 90
B.	Failure to provide notification of a Chloride Violation within 24 hours of awareness as per City Ordinance's Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 17., Part 17-06. (2).	1	X 1	= 1
C.	Failure to provide written notification of a Chloride Violation within five (5) days of awareness as per City Ordinances Article 7-4., Section 7-403., Sub-Section 3., Part 3-07 (b) (e). Sub-Section 17., Part 17-06. (2).	1	X 1	= 1
D.	Failed to sample for permit parameters listed below as Required in permit issued on May 19, 2008 for the period from July 1, 2009 to December 31, 2009 pH (BOD) Biological Oxygen Demand Chloride (TSS) Total Suspended Solids (Cd) Cadmium (Cr (Tot)) Chrome Total (Cu) Copper (Mo) Molybdenum (Ni) Nickel (Pb) Lead BETX, Benzene, Ethyl-Benzene, Toluene, Xylene Benzene (TPH) Total Petroleum Hydrocarbons (FOG) Fats-Oils-Greases	14	X 360	= 5040

E.	Failed to sample for permit parameters listed below as Required in permit issued on May 19, 2008 for the period from January 1, 2010 to July 31, 2010	14	X	245	=	3430
	pH (BOD) Biological Oxygen Demand					
	Chloride (TSS) Total Suspended Solids					
	(Cd) Cadmium (Cr (Tot)) Chrome Total					
	(Cu) Copper (Mo) Molybdenum					
	(Ni) Nickel (Pb) Lead					
	BETX, Benzene, Ethyl-Benzene, Toluene, Xylene					
	Benzene (TPH) Total Petroleum Hydrocarbons					
	(FOG) Fats-Oils-Greases					
F.	Failure to provide notification of a Violation within 24 hours of awareness for:					
	Missing sampling on report due date of January 10, 2010.	1	X	360	=	360
	Missing sampling on report due date of July 10, 2010.	1	X	245	=	245
	as per Ordinances Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 17., Part 17-06. (2).					
G.	Late and Missing Self Monitoring Report (SMR) for July 2009 to December 2009, Due on January 10, 2010 and is 360 days late. In Violation of City Ordinances Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 17. Part 17-06. (2).	1	X	360	=	360
H.	Late and Missing Self Monitoring Report (SMR) for January 2010 to July 2010, Due on July 10, 2010 and is 245 days late. In Violation of City Ordinances Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 17., Part 17-06. (2).	1	X	245	=	245
I.	Missing Flow Data for Self Monitoring Report (SMR) on January 10, 2010. as per Ordinances Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 17. Part 17-06. (2).	1	X	360	=	360
J.	Missing Flow Data for Self Monitoring Report (SMR) on July 10, 2010 as per Ordinances Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 17. Part 17-06. (2).	1	X	245	=	245
K.	Missing Lab Certification for Self Monitoring Report (SMR) on January 10, 2010. as per Ordinances Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 17. Part 17-06. (2).	1	X	360	=	360
L.	Missing Lab Certification for Self Monitoring Report (SMR) on July 10, 2010 as per Ordinances Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 17. Part 17-06. (2).	1	X	245	=	245

M. Failure to provide notification of a Violation within 24 hours of awareness for:
 Missing Self Monitoring Report due date of January 10, 2010. 1 X 360 = 360
 Missing Self Monitoring Report due date of July 10, 2010. 1 X 245 = 245
 as per Ordinances Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 17., Part 17-06. (2).

N. Failed to provide two separate letters of notification of Violations within 5 days as required as required in permit for all Violations of Local Limits as listed herein. 2 X 1 = 2

O. Failed to re-apply for a new Permit prior to expiration of the existing Permit, which expired on May 19, 2010 as required in the Permit standard conditions and City Ordinances Article 7-4, Section 7-403. 1 X 84 = 84

TOTAL NUMBER OF VIOLATIONS 44 11,673

Only working days were used to calculate penalties/violations, **MEMORIAL HOSPITAL of SWEETWATER COUNTY** is a 24/7 operation, and we could use all the days of each month.

The following calculation was used to determine penalty amounts;
 (Number of Violations) X (Number of days in Violation) = Total Number of Violations
 (Number of Violations X Penalty amount, dollar value per violation = Maximum assessable Administrative Penalty
 (Article 7-4. Section 7-403. Sub-Section 3. Part 3-14. (i) and Sub-Section 27. Part 27-06 (a)(b)(c)(d)

24. **MEMORIAL HOSPITAL of SWEETWATER COUNTY** was notified of these Violations, pending actions, and issued a new permit at a meeting on August 13, 2010.

25. **MEMORIAL HOSPITAL of SWEETWATER COUNTY** has significantly violated the City of Rock Springs Ordinance's, the Permit requirements, Pretreatment Program Local Limits, specific prohibitions and requirements therein, and pertaining thereto, which meets the definition of Significant Violation's and thus places **MEMORIAL HOSPITAL of SWEETWATER COUNTY** in Significant Non-Compliance (SNC) for the periods listed herein, and because of the multiple violation during this period, as per Article 7-4. Section 7-403. Sub-Section 27. Parts 27-02, 27-02 (a) (g) (h),

26. That the SNC status requires a formal Public Notice of Violation to be put into the local newspaper, (Rocket Miner) for two (2) sampling and reporting periods this past 14 months.

THEREFORE, BASED ON THE ABOVE FINDINGS, THE MEMORIAL HOSPITAL of SWEETWATER COUNTY IS HEREBY NOTIFIED THAT:

1. These violations by **MEMORIAL HOSPITAL SWEETWATER COUNTY** have forced the City to take formal enforcement action towards **MEMORIAL HOSPITAL SWEETWATER COUNTY** for being in Significant Non-Compliance (SNC). This SNC is for failing to sample/monitor for the two semi-annual periods as stated above. Article 7-4. Section 7-403. Sub-Section 3. Part 3-07 (e). Sub-Section 27. Part 27-02 (a)(g)(h).
2. The City of Rock Springs shall impose **MEMORIAL HOSPITAL SWEETWATER COUNTY** with an administrative penalty of \$ 5889.00 as set forth by the City of Rock Springs Special Projects & Programs Coordinator in compliance with the Ordinance, Permit and program procedures, and Enforcement Response Procedures, as per City Ordinance Article 7-4. Section 7-403. Sub-Section 3. Part 3-07 (e). Part 3-14 (i). Sub-Section 12. Parts 12-01, 12-02, 12-03. Sub-Section 26. Sub-Section 27. Part 27-06.
3. The Administrative Penalty is being issued due to the above findings, be aware that your current status is very serious. If any of these violations repeat that escalated actions and the possibly the maximum amount of administrative penalties may be imposed on **MEMORIAL HOSPITAL of SWEETWATER COUNTY**.
4. The City of Rock Springs has used the calculated value of up to the \$200.00 per violation as per as per the program Enforcement Guide Plan.
TOTAL NUMBER OF VIOLATIONS.....11,673
The calculation dollar value and amount used in these calculations were.....\$200.00/violation/day.
TOTAL MAXIMUM PENALTY AMOUNT ASSESSABLE.....\$2,334,600.00
5. Due to the sheer volume of violations and high assessable penalty amount, and because it is the City of Rock Springs intent to close this action as quickly and equitably as possible, the City believes that the calculated penalty although correct may not be realistic in reaching a settlement of these actions. The City intends to apply an Administrative Penalty of **\$5000.00**, and add the economic benefit of **\$889.00** to this for a total of **\$5889.00**. The City has determined that the lesser administrative penalty may prevent litigation. Although the penalty amount could be higher, this amount is reasonably correct as a deterrent to violating again, to penalize the SIU for the violations, and to resolve this action, pending compliance and agreement with # 6, 7, 8, 9, 10, 11 below.
6. If **MEMORIAL HOSPITAL of SWEETWATER COUNTY** agrees they have violated as stated in this NOV, and;
7. If **MEMORIAL HOSPITAL of SWEETWATER COUNTY** agrees to pay the Administrative Penalty amount of \$5889, and;
8. If **MEMORIAL HOSPITAL of SWEETWATER COUNTY** does not seek litigation, and;
9. If **MEMORIAL HOSPITAL of SWEETWATER COUNTY** is in compliance by **November 10, 2010** with all sampling and reporting requirements as required by the City and there are no related or continued violations, the City of Rock Springs will not apply the full administrative penalties at this time, but;
10. IF **MEMORIAL HOSPITAL of SWEETWATER COUNTY** contests this administrative penalty, and or requests show cause hearing, and makes the decision to take this matter to litigation, the City shall seek the maximum Administrative Penalty.

11. If **MEMORIAL HOSPITAL of SWEETWATER COUNTY** makes a decision to seek litigation, the City of Rock Springs shall seek the full maximum Administrative Penalty amount of \$2,334,600.00, and all court and or attorney costs associated thereto. The City may due to costs and availability of legal staff, turn this action over to the EPA for enforcement action. The EPA may use other calculations to determine penalties.
12. Due to **MEMORIAL HOSPITAL SWEETWATER COUNTY**, status of being in Significant Non-Compliance (SNC), they are informed hereto that the City shall post a Public Notice of the Significant Non-Compliance (SNC) Violation into the local newspaper, The Rocket Miner within 3 days of this Notice of Violation as per compliance with program procedures.
13. **MEMORIAL HOSPITAL of SWEETWATER COUNTY** shall sample at the required sampling frequency. And as of the date of this notice start sampling at a monthly frequency, (verbally informed of this on 08-13-10). It is strongly suggested that **MEMORIAL HOSPITAL of SWEETWATER COUNTY** sample during the first month of each monthly period so that the required reports will be on time. A revised permit has been issued please follow it from here on to prevent future violations, (includes monthly frequency), which shall cause escalated enforcement actions, which shall include greater administrative penalties.
14. The **MEMORIAL HOSPITAL of SWEETWATER COUNTY** Administrator shall provide a letter stating the name of the person who shall be the responsible signatory for **MEMORIAL HOSPITAL of SWEETWATER COUNTY**. This person shall be responsible for performing sampling, reporting and the compliance requirements of the Permit issued on August 13, 2010, and shall be the contact with the City. This should be a management position.
15. **MEMORIAL HOSPITAL of SWEETWATER COUNTY** shall insure that all testing of samples be performed as required to include the use of the required MDL's (Minimum Detection Limits) as stated on page two of their permit.
16. It is strongly recommended that **MEMORIAL HOSPITAL of SWEETWATER COUNTY** review its Permit and the requirements therein and adjust its program standard operating procedures to insure consistent compliance and get their sampling, testing and reporting procedures under control to prevent these violations and future violations of this nature from becoming very costly.
17. Failure by **MEMORIAL HOSPITAL of SWEETWATER COUNTY**, to correct these violations and to prevent future violations of this nature, of the Permit, of the Pretreatment Program or of the Rock Springs City Ordinances may result in escalation to more stringent enforcement action by the City of Rock Springs including but not limited to the imposition of administrative, civil and/or criminal fines and penalties.
18. **MEMORIAL HOSPITAL of SWEETWATER COUNTY** shall provide written documentation of its plans to prevent these types of violation's from re-occurring, including dates of implementation & completion to include written standard operating procedures and preventative procedures. This must include the type of treatment intended to be used which shall meet City Local Limits on a continuous basis as per Article 7-4. Section 7-403. Sub Section 3. Part 3-13, Sub-Section 20. Part 20-01. This information must be provided by **October 11, 2010**

19. **MEMORIAL HOSPITAL of SWEETWATER COUNTY** shall provide an updated Slug and Spill Prevention Plan for the entire facility by **October 11, 2010**, broken down into departments and or areas as needed to define the plan. Must include a copy of all MSDS of chemicals and petroleum products used, and average amounts on hand.

For information regarding this Notice of Violation and or its contents please contact this office at 352-1466.

Sincerely,


Randy Conner
Special Projects and Programs Coordinator

Cc: Vince Crow, City Attorney
Vess Walker, Director of Public Services
Mike Gaviotis, WWTP Supervisor
file

NOV Referenced Ordinance Articles, Sections, Sub-Sections, Parts, And Sub-Parts Used Or Qouted

Article 7-4, Section 7-403

Article 7-4, Section 7-403, Sub-Sections and Parts listed herein

Article 7-4, Section 7-403 Sub-Section 1, Parts 1-01, 1-02, 1-03, 1-04, 1-05

Article 7-4, Section 7-403, Sub-Section 2, Parts 2-01 through 2-48.

Article 7-4. Section 7-403. Sub-Section 3. Parts 3-04, 3-07, Sub Section 4. Parts 4-01, 4-02, 4-03.

Article 7-4. Section 7-403. Sub-Section 3. Part 3-06, Sub-Section 4. Part 4-03. Sub-Section 6. Part 6-01,

Sub-Section 7. Parts 7-01, 7-02, 7-03, 7-05, 7-07. Sub-Section 8, Parts 8-02, 8-03, 8-04, 8-05.

Article 7-4, Section 7-403. Sub-Section 24. Part 24-01.

Article 7-4, Section 7-403, Sub-Section 24., and all other Sections, Sub-Sections, and Parts as listed below:

Article 7-4, Section 7-403, Sub-Section 3, Part 3-07 (b) (e). Sub-Section 17., Part 17-06. (2).

Article 7-4, Section 7-403, Sub-Section 24

(Article 7-4. Section 7-403. Sub-Section 3. Part 3-14. (i) and Sub-Section 27. Part 27-06 (a)(b)(c)(d)

Article 7-4. Section 7-403. Sub-Section 27. Parts 27-02, 27-02 (a) (g) (h),

Article 7-4. Section 7-403. Sub-Section 3. Part 3-07 (e). Sub-Section 27. Part 27-02 (a)(g)(h).

Article 7-4. Section 7-403. Sub-Section 3. Part 3-07 (e). Part 3-14 (i). Sub-Section 12. Parts 12-01, 12-02, 12-03.

Sub-Section 26. Sub-Section 27. Part 27-06.



Wastewater Treatment Plant [307] 352-1465
Building Inspections [307] 352-1541
Planning and Zoning [307] 352-1540
Vehicle Maintenance [307] 352-1452

Department of Public Services
212 D Street, Rock Springs, WY 82901
Office [307] 352-1540 • FAX [307] 352-1545

**PUBLIC NOTICE OF SIGNIFICANT NON-COMPLIANCE
WITH
CITY OF ROCK SPRINGS
ORDINANCES
Article 7-4, Section 7-403,
Sub-Sections, Parts, Sub-Parts therein
AND THE
INDUSTRIAL USER DISCHARGE PERMIT**

The Federal Clean Water Act established the National Pretreatment Program to control the discharge of pollutants into sanitary sewer systems operated by Publicly Owned Treatment Works (P.O.T.W.'s). Under a delegation from EPA, the City of Rock Springs has been given the responsibility for applying and enforcing the Pretreatment Standards for Industrial Users served by the City of Rock Springs Waste Water Treatment Plant.

Pursuant to the requirements of the National Pretreatment Program, the City of Rock Springs must annually publish a list of Industrial Users within its service area that have been found to be in Significant Non-Compliance (S.N.C.). Violations resulting in S.N.C. include:

27-02. Significant violations - Annual Publication. Pursuant to 40 CFR 403.8(f)(d)(vii), the City shall annually publish in the Rocket Miner newspaper a list of the Users who have been in significant non-compliance with any Pretreatment Requirements or Standards at least once during the 12 previous months. This notification shall also summarize any enforcement actions taken against the User(s) during the same 12 months. For purposes of this section an industrial user is in significant non-compliance (S.N.C.) if its violation meets one or more of the following criteria:

(a) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent or more of all the measurements taken during a six-month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter.

(b) Technical Review Criteria (TRC) violations defined here as those in which thirty-three percent or more of all measurements for each pollutant parameter taken during a six-month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH)

(c) Any other violation of a pretreatment effluent limit (daily maximum or longer-term average) that the Control Authority determines has caused, alone or in combination with other discharges, interference, or pass through (including endangering the health of POTW personnel or the general public).

(d) Any discharge of a pollutant that has caused Imminent endangerment to human health, welfare, or to the environment, or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.

(e) Failure to meet, within 90 days after the schedule date, compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance.

(f) Failure to provide, with 30 days after the due date, required reports such as baseline monitoring reports, date, required reports such as baseline monitoring reports, 60-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules.

(g) Failure to accurately report non-compliance.

(h) Any other violation or group of violations, which the Control Authority determines, will adversely affect the operation or implementation of the local pretreatment program.

This notice has been issued to meet the requirement to inform the public and does not constitute any decision as to the actions, if any, necessary to remedy the industrial user non-compliance. Specific questions on any of the listed facilities may be directed to the contact listed at the bottom of the notice.

PERIOD COVERED BY THIS NOTICE: July 10, 2009 to July 15, 2010

NAME OF INDUSTRIAL USER: SWEETWATER COUNTY MEMORIAL HOSPITAL

TYPE OF NON-COMPLIANCE OR VIOLATION:

Failed to sample for pH as required in permit and Ordinance

Failed to sample for (BOD) Biological Oxygen Demand as required in permit and Ordinance

Failed to sample for (TSS) Total Suspended Solids as required in permit and Ordinance

Failed to sample for Chloride as required in permit and Ordinance

Failed to sample for (Cd) Cadmium as required in permit and Ordinance

Failed to sample for (Cr (Tot)) Chrome Total as required in permit and Ordinance

Failed to sample for (Cu) Copper as required in permit and Ordinance

Failed to sample for (Mo) Molybdenum as required in permit and Ordinance

Failed to sample for (Ni) Nickel as required in permit and Ordinance

Failed to sample for (Pb) Lead as required in permit and Ordinance

Failed to sample for BETX, Benzene, Ethyl-Benzene, Toluene, Xylene

Failed to sample for Benzene as required in permit and Ordinance

Failed to sample for (TPH) Total Petroleum Hydrocarbons as required in permit and Ordinance

Failed to sample for (FOG) Fats-Oils-Greases as required in permit and Ordinance

SWEETWATER COUNTY MEMORIAL HOSPITAL was notified of these violations on August 13, 2010.

PERIOD COVERED BY THIS NOTICE: July 10, 2009 to September 15, 2010

NAME OF INDUSTRIAL USER: SWEETWATER COUNTY MEMORIAL HOSPITAL

TYPE OF NON-COMPLIANCE OR VIOLATION:

Late and Missing Self Monitoring Report (SMR) for July 2009 to December 2009, 360 days late.

SWEETWATER COUNTY MEMORIAL HOSPITAL was notified of these violations on August 13, 2010.

PERIOD COVERED BY THIS NOTICE: July 10, 2009 to September 15, 2010

NAME OF INDUSTRIAL USER: SWEETWATER COUNTY MEMORIAL HOSPITAL

TYPE OF NON-COMPLIANCE OR VIOLATION:

Late and Missing Self Monitoring Report (SMR) for January 2010 to July 2010, 245 days late.

SWEETWATER COUNTY MEMORIAL HOSPITAL was notified of these violations on August 13, 2010.

PERIOD COVERED BY THIS NOTICE: July 10, 2009 to September 15, 2010

NAME OF INDUSTRIAL USER: SWEETWATER COUNTY MEMORIAL HOSPITAL

TYPE OF NON-COMPLIANCE OR VIOLATION:

Failed to re-apply for a new permit and provide the required information so a new permit could be issued as required in the permit standard conditions and the City Ordinances.

SWEETWATER COUNTY MEMORIAL HOSPITAL was notified of these violations on August 13, 2010.

PERIOD COVERED BY THIS NOTICE: July 10, 2009 to September 15, 2010

NAME OF INDUSTRIAL USER: SWEETWATER COUNTY MEMORIAL HOSPITAL

TYPE OF NON-COMPLIANCE OR VIOLATION:

Failed to provide two separate letters of notification of violations within 5 days as required as required in permit for all violations of Local Limits as listed herein..

SWEETWATER COUNTY MEMORIAL HOSPITAL was notified of these violations on August 13, 2010.

FOR FURTHER INFORMATION:

Projects and Programs Coordinator,
City of Rock Springs
212 D Street, Rock Springs, WY 82901
(307) 352-1466

"Published as a Legal Notice" in the Rocket Miner September 23, 2010.

Industrial User Fact Sheet and Permit Rationale

Date: _____ Time: _____

Person filling out form: _____

Title: _____

A. BASIC INFORMATION ABOUT THE INDUSTRIAL USER:

Business Name: _____

Business Address: _____

Main Office Address: _____

Mailing Address: _____

Division Name: _____

Responsible Company Official: _____

Title of Responsible Company Official: _____

Name of Person(s) Contacted or in Contact with You: _____

Organization: _____

Telephone Number: _____

Fax Number: _____

E Mail Address: _____

If Industrial User is a Contractor who is the Owner of the Facility or Project: _____

Is a Waste Consultant retained ? Yes () No ()

Name: _____

Company: _____

Phone: _____ FAX: _____

B. DESCRIPTION OF THE INDUSTRIAL USER PROCESS, OPERATIONS, OR PROJECT:

Type of Business: _____

SIC Codes; _____

Industry Classification; IU, SIU, CIU: _____ PSES () PSNS () Source Category : _____

Explanation of Operation or Process's at facility: _____

C. INDUSTRIAL USER INFORMATION:

Have any of these forms or reports been received as of this date: Baseline Monitoring Report _____

Industrial Waste Survey _____ Permit Application Form _____ Lab Certification Document _____

Oil and Grease Survey _____ Self Monitoring Report _____ Industrial User Flow/Ph Log _____

Has Industrial User done any sampling and analysis: _____

Name of Laboratory preparing analysis: _____

Address of Laboratory: _____

Phone Number of Laboratory: () _____ Fax Number of Laboratory: () _____

D. TYPE AND QUANTITY OF DISCHARGES:

Volume of discharge per month: _____ Gallons

Average daily discharge flow rate: _____ GPD

Maximum daily discharge flow rate: _____ GPD

Has discharge flow meter been calibrated recently: _____

Last calibration date: _____

How often is the discharge flow meter calibration done: _____

Does facility use Surface Water _____ Well Water _____ Municipal _____ Reuse/Recycled Water _____

Other _____

Volume of water usage per month: _____ Gallons

Water meter reading for the month: Beginning: _____ Gallons Ending: _____ Gallons

Peak water use for the month: _____ Gallons Estimated well water usage for the month: _____ Gallons

Nature of discharge: _____

E. BASIS FOR PERMIT LIMITS:

Does the facility require sampling, monitoring and permitting due to process's or nature of business activities: _____

Pollutants tested for and why : _____

F. RATIONALE FOR POLLUTANT SELECTION AND LIMITS DEVELOPMENT/APPLICATION:

Summary: _____

Effluent limits applied and basis for those limits: _____

Types of sampling required & documentation for that evaluation: _____

How often should sampling be performed at this site: Weekly _____ Monthly _____ Quarterly _____
Semi-Annually _____ Annually _____ Other _____

G. PERMITTING INFORMATION

Permit Number: _____ Permit Effective Date: _____ Permit Expiration Date: _____

Permit Status: _____

Compliance Dates: _____

Other Special Requirements: _____

H. SPECIAL CONDITIONS AND OR REQUIREMENTS:

Describe any pretreatment system(s) used by the facility, include current and/or planned systems:

Is there a full time waste water treatment operator or pretreatment person? Yes () No ()

Is there a schedule for the installation of new pretreatment technology? Yes () No ()

Current Treatment or Pretreatment process or conditions: _____

Required new pretreatment: _____

Is a Spill Control and Counter Measure Plan (Accidental, Etc.) Required: _____ When: _____

Why: _____

Summary information: _____

I. MISCELLANEOUS INDUSTRIAL USER AND FACILITY INFORMATION:

Location of Sampling Manhole or port: _____

Items of concern noted at first visit: _____

Is there a compliance problem or concern at this time? Yes () No ()

Emergency notification, of City or others , procedures posted ? Yes () No () N/A ()

Is the operation?:Continuous () Batch () Both ()

Does the facility do any operational control testing ? Yes () No () N/A ()

Describe the manner by which any residual solids are disposed of: _____

Is the sludge disposed of via a RCRA manifest and/or method ? Yes () No () N/A ()

Waste Hauler Data:

1. Hauler: _____

Hauler ID #: _____

2. Disposal Site: _____ Hour of operation: _____

3. Frequency: _____ Quantities: _____

4. Location of facility waste pick up site: _____

J. DOES FACILITY HOLD ANY OTHER PERMITS:

Permit Type	Permit Number	Issuing Agency	Expiration Date
-------------	---------------	----------------	-----------------

_____	_____	_____	_____
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_____	_____	_____	_____
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_____	_____	_____	_____
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LEGAL NOTICES

LEGAL NOTICES

**PUBLIC NOTICE OF SIGNIFICANT NON-COMPLIANCE
WITH
CITY OF ROCK SPRINGS
ORDINANCES
Article 7-4, Section 7-403,
Sub-Section, Parts Sub-Parts therein
AND THE**

INDUSTRIAL USER DISCHARGE PERMIT

The Federal Clean Water Act established the National Pretreatment Program to control the discharge of pollutants into sanitary sewer systems operated by Publicly Owned Treatment Works (P.O.T.W.'s). Under a delegation from EPA, the City of Rock Springs has been given the responsibility for applying and enforcing the Pretreatment Standards for Industrial Users served by the City of Rock Springs Waste Water Treatment Plant.

Pursuant to the requirements of the National Pretreatment Program, the City of Rock Springs must annually publish a list of Industrial Users within its service area that have been found to be in Significant Non-Compliance (S.N.C.). Violations resulting in S.N.C. include:

27-02. Significant Violations - Annual Publication. Pursuant to 40 CFR 403.8(f)(d)(vii), the City shall annually publish in the Rocket Miner newspaper a list of the Users who have been in significant non-compliance with any Pretreatment Requirements or Standards at least once during the 12 previous months. This notification shall also summarize any enforcement actions taken against the User(s) during the same 12 months. For purposes of this section an industrial user is in significant non-compliance (S.N.C.) if its violation meets one or more of the following criteria:

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(b) Technical Review Criteria (TRC) violations defined here as those in which thirty-three percent or more of all measurements for each pollutant parameter taken during a six-month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH)

(c) Any other violation of a pretreatment effluent limit (daily maximum or longer-term average) that the Control Authority determines has caused, alone or in combination with other discharges, interference, or pass through (including endangering the health of POTW personnel or the general public).

(d) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare, or to the environment, or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.

(e) Failure to meet, within 90 days after the schedule date, compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance.

(f) Failure to provide, with 30 days after the due date, required reports such as baseline monitoring reports, date, 60-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules.

(g) Failure to accurately report non-compliance.

(h) Any other violation or group of violations, which the Control Authority determines, will adversely affect the operation or implementation of the local pretreatment program.

This notice has been issued to meet the requirement to inform the public and does not constitute any decision as to the actions, if any, necessary to remedy the industrial user non-compliance. Specific questions on any of the listed facilities may be directed to the contact listed at the bottom of the notice.

PERIOD COVERED BY THIS NOTICE: November 2, 2009 through

of the notice.

PERIOD COVERED BY THIS NOTICE: November 2, 2009 through August 31, 2010

NAME OF INDUSTRIAL USER: TRI-MAC TRANSPORTATION

TYPE OF NON-COMPLIANCE OR VIOLATION:

Late Self Monitoring Report for November 2009, 12 days late.

TRI-MAC TRANSPORTATION was notified of these violations on August 16, 2010.

PERIOD COVERED BY THIS NOTICE: November 2, 2009 through August 31, 2010

NAME OF INDUSTRIAL USER: TRI-MAC TRANSPORTATION

TYPE OF NON-COMPLIANCE OR VIOLATION:

Exceedance of **Zinc** local limit of 7.18 mg/l, Reported value of 13.4 mg/l

TRI-MAC TRANSPORTATION was notified of these violations on August 16, 2010.

PERIOD COVERED BY THIS NOTICE: November 2, 2009 through August 31, 2010

NAME OF INDUSTRIAL USER: TRI-MAC TRANSPORTATION

TYPE OF NON-COMPLIANCE OR VIOLATION:

Exceedance of **Cadmium** local limit of 0.005 mg/l, Reported value of 0.007 mg/l

Exceedance of **Cadmium** local limit of 0.005 mg/l, Reported value of 0.016 mg/l

Exceedance of **Cadmium** local limit of 0.005 mg/l, Reported value of 0.020 mg/l

Exceedance of **Cadmium** local limit of 0.005 mg/l, Reported value of 0.007 mg/l

Exceedance of **Cadmium** local limit of 0.005 mg/l, Reported value of 0.032 mg/l

Exceedance of **Cadmium** local limit of 0.005 mg/l, Reported value of 0.013 mg/l

Exceedance of **Cadmium** local limit of 0.005 mg/l, Reported value of 0.028 mg/l

Exceedance of **Cadmium** local limit of 0.005 mg/l, Reported value of 0.076 mg/l

Exceedance of **Cadmium** local limit of 0.005 mg/l, Reported value of 0.156 mg/l

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PERIOD COVERED BY THIS NOTICE: November 2, 2009 through August 31, 2010

NAME OF INDUSTRIAL USER: TRI-MAC TRANSPORTATION

TYPE OF NON-COMPLIANCE OR VIOLATION:

Failed to Sample and Report for Chrome Hex/VI as required in Permit from 02-01-10 to August 31, 2010

TRI-MAC TRANSPORTATION was notified of these violations on August 16, 2010.

PERIOD COVERED BY THIS NOTICE: November 2, 2009 through August 31, 2010

NAME OF INDUSTRIAL USER: TRI-MAC TRANSPORTATION

TYPE OF NON-COMPLIANCE OR VIOLATION:

Exceedance of **pH** local limit of >5.0, on 07-08-10 Reported value of 4.95

Exceedance of **pH** local limit of >5.0, on 07-14-10 City tested value of 3.75

TRI-MAC TRANSPORTATION was notified of these violations on August 16, 2010.

PERIOD COVERED BY THIS NOTICE: November 2, 2009 through August 31, 2010

NAME OF INDUSTRIAL USER: TRI-MAC TRANSPORTATION

TYPE OF NON-COMPLIANCE OR VIOLATION:

Failed to provide 24 hour notification of Local Limit violations on 01-04-10, 02-01-10, and 05-06-10 as required in permit.

TRI-MAC TRANSPORTATION was notified of these violations on August 16, 2010.

PERIOD COVERED BY THIS NOTICE: November 2, 2009 through August 31, 2010

NAME OF INDUSTRIAL USER: TRI-MAC TRANSPORTATION

TYPE OF NON-COMPLIANCE OR VIOLATION:

Failed to provide letter of notification of Local Limit violations within 5 days as required in permit for all violations of Local Limits as listed herein.

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LEGAL NOTICES

LEGAL NOTICES

PUBLIC NOTICE OF SIGNIFICANT NON-COMPLIANCE WITH

CITY OF ROCK SPRINGS ORDINANCES

Article 7-4, Section 7-403, Sub-Sections, Parts, Sub-Parts therein AND THE

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(c) Any other violation of a pretreatment effluent limit (daily maximum or longer-term average) that the Control Authority determines has caused, alone or in combination with other discharges, interference, or pass through (including endangering the health of POTW personnel or the general public).

(d) Any discharge of a pollutant that has caused Imminent endangerment to human health, welfare, or to the environment, or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.

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PERIOD COVERED BY THIS NOTICE: July 10, 2009 to July 15, 2010
NAME OF INDUSTRIAL USER: SWEETWATER COUNTY MEMORIAL HOSPITAL

TYPE OF NON-COMPLIANCE OR VIOLATION:

Failed to sample for pH as required in permit and Ordinance
Failed to sample for (BOD) Biological Oxygen Demand as required in permit and Ordinance
Failed to sample for (TSS) Total Suspended Solids as required in permit and Ordinance
Failed to sample for Chloride as required in permit and Ordinance
Failed to sample for (Cd) Cadmium as required in permit and Ordinance
Failed to sample for (Cr (Tot)) Chrome Total as required in permit and Ordinance
Failed to sample for (Cu) Copper as required in permit and Ordinance
Failed to sample for (Mo) Molybdenum as required in permit and Ordinance
Failed to sample for (Ni) Nickel as required in permit and Ordinance
Failed to sample for (Pb) Lead as required in permit and Ordinance
Failed to sample for BETX, Benzene, Ethyl-Benzene, Toluene, Xylene
Failed to sample for Benzene as required in permit and Ordinance
Failed to sample for (TPH) Total Petroleum Hydrocarbons as required in permit and Ordinance
Failed to sample for (FOG) Fats-Oils-Greases as required in permit and Ordinance

SWEETWATER COUNTY MEMORIAL HOSPITAL was notified of these violations on August 13, 2010.

PERIOD COVERED BY THIS NOTICE: July 10, 2009 to September 15, 2010

NAME OF INDUSTRIAL USER: SWEETWATER COUNTY MEMORIAL HOSPITAL

TYPE OF NON-COMPLIANCE OR VIOLATION:

Late and Missing Self Monitoring Report (SMR) for July 2009 to December 2009, 360 days late.

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PERIOD COVERED BY THIS NOTICE: July 10, 2009 to September 15, 2010

NAME OF INDUSTRIAL USER: SWEETWATER COUNTY MEMORIAL HOSPITAL

TYPE OF NON-COMPLIANCE OR VIOLATION:

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PERIOD COVERED BY THIS NOTICE: July 10, 2009 to September 15, 2010

NAME OF INDUSTRIAL USER: SWEETWATER COUNTY MEMORIAL HOSPITAL

TYPE OF NON-COMPLIANCE OR VIOLATION:

Failed to re-apply for a new permit and provide the required information so a new permit could be issued as required in the permit standard conditions and the City Ordinances.

SWEETWATER COUNTY MEMORIAL HOSPITAL was notified of these violations on August 13, 2010.

PERIOD COVERED BY THIS NOTICE: July 10, 2009 to September 15, 2010

NAME OF INDUSTRIAL USER: SWEETWATER COUNTY MEMORIAL HOSPITAL

TYPE OF NON-COMPLIANCE OR VIOLATION:

Failed to provide two separate letters of notification of violations within 5 days as required in permit for all violations of Local Limits as listed herein.

SWEETWATER COUNTY MEMORIAL HOSPITAL was notified of these violations on August 13, 2010.